

1 May 2015

The Marine Pests Unit
Animal Biosecurity Branch
Department of Agriculture
GPO Box 858
Canberra ACT 2601

RE: Review of the National Marine Pest Biosecurity Discussion Paper

As the peak representative body for the wild catch, aquaculture and trader/processor seafood sectors in the Northern Territory, the Northern Territory Seafood Council (NTSC) welcomes the opportunity to comment on the review of the National Marine Pest Biosecurity Discussion Paper on behalf of industry.

The NT seafood industry is very aware of the potential impacts of marine pests as many of our members were involved in the black-striped mussel outbreak in Darwin marinas in 1999, or saw first hand the effects on businesses involved. Coming at the beginning of the Northern Prawn Fishery (NPF) season, many NPF and other fishing vessels remained quarantined in the marina for nearly one month, causing significant loss of income and disruption to fishing operations and crew. In addition, the 57 NPF vessels that had left before the marinas were closed had to be tracked down and inspected by divers at sea – an additional cost through disruption to fishing operations and the government resources required to track down and dive on those vessels.

With no international travel and limited regional movement of fishing vessels, the NT seafood industry does not consider itself a high risk source of marine pest introduction or translocation. Industry does however, remain concerned at the potentially significant impact on their industry of biosecurity breaches from other sources, with vessel biofouling and ballast water presenting only part of the risk.

The seafood industry would like to note other methods of marine pest and disease organisms potentially entering Australia, and it considers the risk posed by these methods is not being adequately managed at present.

NTSC understands biosecurity risks for food imports are the responsibility of AQIS, but when the end result is the same; the spread of marine pests and diseases and their detrimental impact on the environment and businesses; then the approach should be a coordinated one. It is not sufficient to provide adequate risk management for one method of introduction while failing to provide the same level for other methods.

The following are the views of the largest aquaculture operation in the NT:

“As an aquaculturist, disease biosecurity is a big deal for us. i.e. don't bring in diseases from overseas in live or fresh animals that have the potential to spread into our wild and farmed seafood populations.”

In the NT there are numerous recent examples in land farming where this has fallen down with disastrous consequences to industry and our food production capacity.

If the intention of this review is to protect against aquatic diseases the Terms of Reference will need to be widened to include an expert risk-based assessment of the dangers of disease from regions that export fish to Australia. A potential outcome would be restricting the importation of whole and fresh seafood from locations where there are known aquatic diseases - as in past examples where fresh prawns can not be imported into Australia."

Dan Richards, Humpty Doo Barramundi

The following is from an Australia-wide aquaculture industry association:

A key issue is the Import Risk Assessment process and the fact the information on potential risk needs to be current, must be used in a timely manner and must have a means to act on this.

1. **information on potential risk needs to be current:** new threats/risks can happen quickly and the source of information for the regulator may not keep up with this (i.e. they may not be told of a new threat for an exporting country or they do not have capacity to seek up to date info). As international production increases, the threats increase and there must vigilance in this area.
2. **must be used in a timely manner:** so as part of the process (subject to the point above) there needs to be a rapid response available to address the threat and minimise any impacts. This would work best if the information obtained in point one above was provided in a transparent manner and to those affected through a coordinated system of communication. This allows businesses and the community to take actions (i.e. impose a higher quarantine measures on their businesses etc.)
3. **must have a means to act on this:** An industry association may then find out about the disease/pest and are then required to let people know. But after that the process is unclear - biosecurity resources have been cut as has research and development on preventative measures (genetics, vaccines, quarantine protocols). So there is a need for plans to address any threat

Current issues relate to the importation of whole/gilled and gutted/skin on, unfrozen barramundi and assorted tropical reef species as well as any live fish (e.g. aquarium) and the associated risk they pose for the introduction of pests and diseases.

The data on species of fish being imported is also deficient. For example Barramundi (*Lates calcarifer*) is not identified in the import data (under the **International Import Information - Harmonised Tariff Item Statistical Code**) and there is no separate classification for fillets, so any fillet product imports are likely to go to a generic classification. This means it is impossible to accurately trace potential disease threats.

NTSC provides the following responses with regard to the questions asked in the Discussion Paper:

Issue: Limited commitment and resource allocation to implement the National System

Question 1: What do you consider to be the main impacts (consequences) from marine pests to your business, industry, activities or the environment?

Potential impacts for the fishing industry include:

- Biofouling affecting vessel performance, fuel consumption, and cost of removal from vessels, infrastructure and aquaculture facilities.
- Interaction with wild or aquaculture species (competition for food or habitat).
- Quarantine and movement restrictions and costs.

Question 2: What activities should the Australian Government do to manage the biosecurity risks associated with marine pests to an acceptable level (to protect your business, industry, activities or the environment)?

Provide a coordinated, cost effective and consultative national approach to assessing risks, monitoring key sites and responding to marine pest incursions, with adequate support for state and Territory activities. Make it simple for all states and the Territory to meet the requirements of a national standard for marine pest monitoring and management and ensure there are the tools (carrot or stick) to meet those requirements.

Question 3: What information or data should the Australian Government collect to support ongoing national commitment to managing marine pest biosecurity

Unable to comment on this but stress the need for information or data to be consistent across all states and the Territory, simple, cost-effective and meeting a national standard.

Issue: Current biofouling requirements are not consistent across jurisdictions

Question 4: What are the best ways to manage and monitor the biosecurity risks of biofouling on vessels?

Suggest giving AQIS adequate resources to include biofouling inspections in their current vessel ballast water and cargo inspections.

Question 5: If the Commonwealth progresses to regulate the management of biofouling on international vessels, what role should it take in the development of domestic controls by the states and territories?

Establish a national standard that is simple, cost-effective and likely to be followed. Support state and Territory activities, especially in areas at high risk of marine pest incursions or translocation of already established invasive marine pests from one location to another. This support could be in the form of funding or assistance in the development of educational materials.

Issue: The 'species-based' approach to manage biofouling

Question 6: Should the department consider a regulatory framework for international biofouling management that is:

- a species-based approach (as currently proposed in the Biofouling RIS) or
- an approach based on a requirement for vessel operators to adopt IMO Biofouling Guidelines, including onboard biofouling management plan and record book.

Unable to comment on this other than to stress that simplicity and cost-effectiveness is the key to the success of any approach.

Issue: Minimise the cost to industry of domestic ballast water management requirements

Not qualified to comment, but please see the comment on question 6.

Issue: Incomplete implementation of the National Monitoring Strategy

Question 10: What are the most important aim(s) for monitoring in a cost-effective national marine pest biosecurity system?

A monitoring system aimed at preventing outbreaks of high cost/high impact marine pests, a system that is designed to have complete national coverage and adherence.

Question 11: How should this monitoring be achieved?

Please see previous comments regarding question 2.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Robert Fish', with a long horizontal flourish extending to the right.

Robert Fish
Chairman