To whom it may concern -

The Department of Fisheries welcomes the opportunity to comment on the national review of marine pest biosecurity. Please find our responses below, and the required cover sheet attached.

Some of the "questions for stakeholders" have been addressed, as well as further comments.

1 Question 3: How effective are the current arrangements in preventing marine pests?

There are clear management of ballast water arrangements in place at the national border, therefore actively preventing ballast water marine pest species from entering Australian waters. However, until new biosecurity legislation is implemented, there is no current management of international vessel biofouling at the national level. As biofouling vectored marine pest species make up to 70% of the risk for vessel vectored marine pests, this is a concerning gap that is likely to take several years to address.

2 Question 4 – how effective are current arrangements for the detection, eradication and containment of invasive marine pests?

Currently, there is no clear list of marine pests of concern. There are several older lists, for example: the CSIRO Marine Research / Hayes et al, list 2005, CCIMPE trigger list, 2006; Port monitoring/NIMPCG list 2009; Species of Concern/Hewitt 2009 list. These cause confusion to stakeholders and jurisdictions alike, and some are disproportionately ballast water focussed. A revised list, or even better, a framework to create a foundation national list with jurisdiction specific additions, would provide greater clarity.

Also, there is a need to create systems that can be supported by all jurisdictions. Although nationally significant high priority/risk ports have been identified as part of the national system for port monitoring, not all jurisdictions have implemented monitoring these locations. There needs to be a way to ensure all locations are monitored and funded, as the framework relies on all links in the country being strong.

Finally, unlike for terrestrial biosecurity, marine biosecurity has no deed cost sharing arrangements for emergency responses to marine pest detections. Although the NEBRA offers a framework for pest responses including cost-sharing arrangements where it is in the public interest, to date this has proven very difficult to trigger for marine pest incursions. This needs to be addressed before a large scale marine biosecurity incident arrives, so appropriate level responses can be made, and costs shared equitably.

3 Question 5 – Does your organisation, business or activities have any difficulty implementing the current marine pest biosecurity arrangements? If 'Yes' please briefly explain what these difficulties are and how they impact your activities and / or industry.

The Department of Fisheries (Fisheries) has invested considerable resources in implementing port monitoring at the three high risk ports for WA (Fremantle, Dampier and Port Hedland), as well as extra high risk sites. However, providing long term ongoing funding for these activities is problematic. As mentioned above, a system, and/or funding, is needed that ensures all jurisdictions can monitor high risk or high priority areas on an ongoing basis.

4 Question 7: Are there cost effective compliance and enforcement arrangement for industry, governments and the community?

Yes, but only for ballast water management at the national level. There are no compliance or enforcement arrangements for the main risk vectors and pathways, such as vessel biofouling, or the ornamental fish trade from a marine pest perspective.

5 Question 9: How effective is the Australia Government in coordinating a response to marine pest incursions?

This is unknown, as recently all marine pest detections have been dealt with at a state level. Emergency response arrangements should be tested by realistic exercises on a regular basis to ensure processes are clear, effective and understood.

6 Additional comments:

It would be useful to clarify the following points relating to national biosecurity arrangements for marine pests:

What is the role of the Commonwealth in this space?

- a) Additional leadership would be welcomed in the following areas:
 - Raising awareness and support of government, industry and the community (e.g. a National Marine Pest Day)
 - Leading by example in developing real <u>partnerships</u> with industry (rather than just consulting). For example, requiring big industries, negotiating to come to Australia, to have clear and consistent aquatic biosecurity operational requirements. These could then be used as a guide for the states and territories.
 - Taking calculated risks, and being outcome (rather than process) focussed.
 - Coordinating marine biosecurity research across the country, so that it is a priority, supplementary and complementary, to avoid duplication.
 - Ensuring national funding bodies, such as FRDC and ARCs, have a specific stream for marine biosecurity research funding, to fund the above research properly. This could form part of a communications plan.
 - Similarly, negotiating to get recognition of this as a priority, and associated funding in this space (as occurs with terrestrial biosecurity). This funding should be made available to states according to their delivery of biosecurity services. Currently, in marine biosecurity any funding made available (such as this 'review's' \$5m) is retained by the Commonwealth.
- b) Taking a greater world view: i.e. environmental and political scanning of issues, then communicating these to all jurisdictions to ensure we make the most of global opportunities that present themselves. For example, the G20 Summit focus on climate change: how can we leverage this in the media? Rising water temperatures may provide the tipping point for marine pests such as Asian green mussels to establish in the Australian environment. We need to get messages out linked to the current focus and public discourse.
- c) Setting up robust infrastructure to ensure appropriate cost recovery from all risk creators and beneficiaries i.e. both through ballast water and biofoulin. If this was collected by the Commonwealth (i.e. from international vessels), an appropriate and endorsed system of return of funds to the states should be put in place.

Acknowledging that the Commonwealth only has control of what it controls, the jurisdictions, industries, communities must recognise they have to step up too as part of

biosecurity being a shared responsibility. The Commonwealth may be able to 'encourage' this through mechanisms such as requiring any vessel coming from a domestic, unmonitored port, and going to any other port in Australia that is monitored, to be thoroughly cleaned before it leaves the first port. This would prevent passing on the risk of the unmonitored port. However, this only works if required at the national level.

If you have any queries, please don't hesitate to contact me on (08) 9482 7385.

Kind regards,

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