# National Marine Pest Biosecurity Review Issues Paper - Oct 2014

**National Aquaculture Council’s response to questions for stakeholders.**

**About the marine pest biosecurity system**

1. What are the key issues for your business / organisation that you would like to see addressed in this review?

Perception that “one size fits all” with respect to a national strategy for managing marine pests is problematical. The typical profile of hazards vs risk for aquatic production industries is very different to the profile for other aquatic industries (shipping etc), and this needs to be recognised.

1. How do current marine pest biosecurity arrangements affect your organisation, business or recreational activities?

For the aquatic production industries IMS/MP management policy & strategies represent a double edged sword; there needs to be a balance between policy/regulation aimed at managing risk and excessive regulatory burden.

1. How effective are the current arrangements in preventing marine pests arriving and establishing in Australia?

Don’t know; can’t comment.

1. How effective are the current arrangements for the detection, eradication and containment of invasive marine pests?

My perception is that current arrangements are not well focussed on the risks, and further that “arrangements” are not harmonised across jurisdictions.

1. 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 you activities and / or industry.

No particular difficulty with current national arrangements for the aquaculture sector, because:

1. Few of the national arrangements require implementation in the aquaculture context (except in-water cleaning guidelines); most of the arrangements are jurisdiction based.
2. Mandatory & voluntary biosecurity measures already implemented by most aquaculture enterprises against risk from pathogens entrain a co-lateral benefit with respect to marine pest management.
3. Is the marine pest biosecurity regulatory approach (through legislation, nationally agreed standards, guidelines and protocols) consistent across Australia and aligned to relevant international standards?

Don’t know; can’t comment.

1. Are there cost effective compliance and enforcement arrangements for industry, governments and the community?

Don’t know. Are there any?

**About governance and infrastructure**

1. How effective is the National System for the Prevention and Management of Marine Pest Incursions as an overarching framework for Australia’s marine pest biosecurity arrangements?

Appears plausible in principle; needs refinement and field testing to give it better fit for purpose.

1. How effectively has the Australian Government coordinated the development and implementation of harmonised, national marine pest biosecurity arrangements?

Not well at all historically. Appears to have been a silo structure within “marine biosecurity”. Confusion between varied govt committees/working groups over issues addressed; ie IMS management, antifoulant release, organic load from in-water cleaning of biofouling. Viewed by industry as confusing and inefficient.

Recent changes provide hope and expectation of improvement.

1. How effectively does the Australian Government engage industry stakeholders and other environmental partners in the development and implementation of national marine pest biosecurity measures?

Historically patchy, often poorly. Communication post stakeholder consultation events has been slow; endorsement/decisions on matters of vital interest to stakeholders has been slow (perhaps a function of the approvals ladder from MPSC Stakeholder forums, to MPSC, to NBC, to AgSOC, to AgMIN etc; which seems to proceed at a glacial pace).

Recent changes provide hope and expectation of improvement.

1. How effective is the Australian Government in coordinating a response to marine pest incursions?

Largely untested (exception Black Striped Mussel in Darwin Harbour?)

1. How could the governance and infrastructure arrangements for marine pest biosecurity be changed to achieve better outcomes for marine pest biosecurity?

The sharp segregation of MPSC Industry Forums from MPSC meetings (consecutive but separate days), together with secrecy about some MPSC meeting documents (Govt only), and slow communication back to stakeholders, does not engender a sense of meaningful engagement and consultation with the industries directly affected by the MPSC’s decisions.

Industry representatives who serve as Observers on government committees without formal standing (such as the MPSC Industry Forum) understand that they have a two-way liaison role but also have a responsibility of maintaining committee confidentiality when required. I also serve as an Observer on the Sub-Committee for Aquatic Animal Health (another government committee without formal standing), but here the business is conducted much more openly and efficiently, with better collaboration, leading to better outcomes for both industry stakeholders and government.

It would be helpful for the marine pest biosecurity branch to adopt a similar collegiate approach to achieve better outcomes for marine pest biosecurity.

**About prevention, eradication, containment and on-going management**

1. How effective and efficient are the current national arrangements at minimising the risks posed by ballast water?

Don’t know; can’t comment.

1. How do the current national arrangements for transfer of ballast water between domestic ports affect your activities and/or business?

Potential risk, dimension unknown

1. How effective and efficient are the current national arrangements at minimising the risks posed by biofouling?

Don’t know; can’t comment.

1. How effective and efficient are the current national arrangements at minimising the risks posed by the aquarium trade and other pathways for the introduction of marine pests?

Imports by aquarium trade (and other imported commodities/goods) are a real but unquantified risk (will be affected by review of the Australian priority marine pests list). Recent & proposed changes to import protocols will also affect residual risk.

1. How effective are the current national arrangements for determining and actioning the appropriate national response to a marine pest incursion?

In the context of impact on aquaculture, a national response (cf a regional response) remains untested.

It needs to be flagged that current discussion on the cost-recovery aspect of response to marine pest incursions does include an element of concern to the aquaculture industry.

Namely, the Commonwealth government's cost recovery guidelines of 2005 incorporate words to the effect that, “in the case of cost recovery, if the creator of the risk cannot be found then there will be an attempt to recover costs from the beneficiaries”. The word “beneficiaries” does not distinguish between those people who are the risk creators and the people who are impacted by the risks.

In this context such misuse of the wording has the potential to create an unintended and perverse outcome; and needs to be addressed.

1. How effective are the current national arrangements for containing and managing established marine pests in Australia?

Don’t know; perception is that arrangements need field testing.

1. Which initiatives have delivered the best improvement to addressing marine pest risks in your sector?
2. Better education of the aquaculture sector about risks posed to aquaculture by marine pests, and risks posed to the environment by aquaculture practices spreading marine pests.
3. More robust biosecurity measures adopted by industry practitioners primarily aimed at protection from parasites and diseases.

**About supporting arrangements: monitoring, communications, research and development, evaluation and review**

1. If your organisation is currently undertaking monitoring for marine pests, what are your reasons for doing so and how do you use the information you collect?

See response to question 5 b) above:

“Mandatory & voluntary biosecurity measures already implemented by most aquaculture enterprises against risk from pathogens entrain a co-lateral benefit with respect to marine pest management.”

1. How effective has the implementation of the National Monitoring Strategy been across Australia?

Don’t know; can’t comment.

1. What impact has the implementation of the National Monitoring Strategy had on your business or organisation and how can this be improved?

None that I am aware of.

1. Do Australia’s national arrangements provide access to relevant marine pest biosecurity information and intelligence sources to improve decision making at the regional, state and national levels?

Don’t know; can’t comment.

1. How could engagement and communication with your organisation or sector be improved to deliver positive outcomes for marine pest biosecurity?

Please see responses to questions 9, 10, and 12 in this submission.

1. Do the National System and current national marine pest biosecurity arrangements provide an effective platform to continuously improve biosecurity outcomes?

Probably.

1. How effective and coordinated is the current national approach to research and development on invasive marine species at improving the national marine pest biosecurity system?

Has not been particularly well co-ordinated (shrinking pool of R&D funds and increasing R&D needs creates fierce completion between research providers). Recent Government commitment of $5M will provide opportunity to address targeted needs & gaps.

**Additional comments**

Please provide comments or information on any other issues you consider relevant to the management of invasive marine pests, implementation of the current marine pest biosecurity arrangements, or your proposals to improve Australia’s marine pest biosecurity system.

Additional comments:

1. The Issues Paper refers to marine pests as “*exotic marine species that pose a threat to Australia’s marine environment or industries*”. Several aquaculture species (Atlantic salmon, Pacific oysters) are by definition exotic, but only in some situations are considered “pests” (farmed cf feral). Need to exercise care with definition of “marine pests”.
2. It is recognised that there is a pragmatic division between management of marine pathogens (organisms causing transmittable diseases affecting stock) and marine pests (organisms otherwise impacting on marine biota and/or assets). However there would be benefit in information sharing and greater awareness amongst government agencies and industry stakeholders concerned with both disease and pest risks, so as to improve efficiencies of risk management.

Summary messages of this submission are that:-

1. The National System for the Prevention and Management of Marine Pest Incursions appears to be plausible as an overarching framework for Australia’s marine pest biosecurity arrangements. However it needs refinement and field testing to give it better fit for purpose.
2. Historically governance arrangements of Marine Pest Biosecurity has been disjointed, and consultation with industry stakeholders affected by the MPSC’s recommendations decisions has been patchy and sometimes poor. ***This is believed to be a function of the system and not the persons involved, perhaps compounded by inadequate resourcing for the functions the Unit and MPSC is expected to discharge.***
3. Recent discussions with MPSC do provide hope and expectation of improvement in this arena.
4. The Marine Pest Unit of the Department is to be congratulated for this open invitation to comment on any part of the national marine pest biosecurity arrangements that affect stakeholder activities.