

**Submission on the Discussion Paper**  
***Modernising Australia's approach to managing***  
***established pests and diseases of national significance***

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**This submission is provided to the National Biosecurity Committee on behalf of  
Animal Health Australia by:**

Dr Peter Dagg  
Executive Manager  
Emergency Animal Disease Preparedness and Response Services (A/g)

Animal Health Australia

## Introduction

Animal Health Australia (AHA) is an incorporated, not for profit, public company established in 1996 by the Australian, state and territory governments, and major national livestock industries, and is governed by an independently selected, skills-based board. Our members encompass all the state, territory and federal governments, the chief terrestrial livestock industries as well as other animal health organisations and service providers.

AHA works with our members to keep Australia free of new and emerging diseases and to improve animal health<sup>1</sup>, enhance market access and foster the resilience and integrity of the Australian animal health system. By building collaborative partnerships between industries and governments, we help safeguard domestic and international confidence in our animal health systems and livestock products and thereby facilitate market access. We offer expert technical advice, support and services to our members and other industry stakeholders. Our portfolio of activities ultimately has high relevance to individual producers.

Australia's international and domestic markets depend on our excellent animal health status and reputation, which in turn depends on government, industry and stakeholder commitment to animal health and welfare, biosecurity, surveillance, and emergency disease preparedness and response. Government and industry partnerships have been successful in delivering a world-class system for the management of livestock biosecurity risks, which helps Australia maintain its enviable disease free status. AHA plays a vitally active role in maximising the effectiveness of partnerships and consultative mechanisms to achieve our goals.

The issue of pests and diseases and the significant impact they have on Australia's livestock industries is of vital importance to AHA and our government and industry member organisations.

Australian livestock industries benefit from our relative freedom from pests and diseases which are present in many countries around the world, as well as the control and management of endemic pests and diseases to support national and international market access.

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<sup>1</sup> Animal health and welfare are inextricably linked. AHA's role in the animal welfare continuum is contained to issues that may impact on animal production, trade and market access and community social licence.

## Executive summary

Animal Health Australia (AHA) appreciates the opportunity to contribute to the Discussion Paper *Modernising Australia's approach to managing pests and diseases of national significance* (the Discussion Paper), as prepared by the National Biosecurity Committee (NBC). This submission from AHA is supported by the Australian Lot Feeders' Association (ALFA) and SheepMeat Council of Australia.

The key points we would like to make in response to the Discussion Paper are:

1. AHA recognises the significant impact pests and diseases have on Australia's livestock and plant industries and our natural environment, and we support a coordinated national approach to the management of pests and diseases of national significance.
2. AHA 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'* and supports the suggested changes for the future management of pest, diseases and weeds put forward in this paper by the NBC to facilitate a coordinated national approach through partnerships between stakeholders.
3. Early engagement and discussion with relevant industry stakeholders is vital to ensure clear and appropriate criteria for identifying and maintaining a list of established pests and diseases of national significance for which efficient control can be achieved.
4. The Emergency Animal Disease Response Agreement (EADRA)<sup>2</sup> contains a number of established diseases, and the relevance and implication of this needs to be considered as part of the proposed modernisation of Australia's approach to managing pests and diseases of national significance.
5. AHA would be willing to assist in this process by facilitating and brokering partnerships between government and industry stakeholders during the consultation process, and ultimately assisting in implementing management plans when and where required.

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<sup>2</sup> [www.animalhealthaustralia.com.au/programs/emergency-animal-disease-preparedness/ead-response-agreement/](http://www.animalhealthaustralia.com.au/programs/emergency-animal-disease-preparedness/ead-response-agreement/)

## **AHA RESPONSE TO CONSULTATION QUESTIONS POSED IN THE DISCUSSION PAPER**

### **Page 6:**

#### **1) Are the proposed policy principles appropriate and practical?**

Asset based protection at first sight may appear to be appropriate in this context, but it has some practical issues that need further consideration. For example, a disease/weed/pest may only be present in one or multiple regions, and therefore the asset based protection approach needs to be applied at a regional level (e.g. Asian honey bee – *Apis cerana*).

In the Discussion Paper, the Background section refers to a definition of ‘containment’, and specifically states *‘Where a pest or disease is contained to a defined area, the emergency response needs to make provision for eradication should they occur in a new area or in a different, more virulent, form. The proposal outlined in this paper does not apply to these circumstances, or to emergency containment as part of an eradication response’*. AHA notes that the primary objective of EADRA in relation to emergency animal diseases is eradication. The issue of ‘emergency containment’ is important but not the preferred course of action.

The EADRA Guidance Document *‘Interpretation of Containment in the Emergency Animal Disease Response Agreement’* sets out the following definition for ‘containment’:

#### **For an EAD that is normally exotic to Australia**

The implementation of those agreed measures necessary to prevent or limit the spread of the EAD to unaffected areas, while incident definition and eradication measures are implemented that are aimed at a return to country freedom. Containment continues until either the disease is eradicated in accordance with an agreed EADRP, or until a decision is made not to eradicate the disease and an alternative approach to eradication is agreed.

#### **For an EAD that is normally present in Australia or parts of Australia, (but which has occurred in an unusual or fulminating form)**

The implementation of those agreed measures necessary to prevent or limit the spread of the EAD, while control measures are being implemented, with those containment and control measures remaining in place until the disease returns to the normal state for that disease, or to an agreed new normal state.

While the Discussion Paper appears to exclude issues in ‘containment’ there is a case for applying these arrangements to issues in this phase as there are many relevant examples. In this context, the issue of ‘transition’ to asset based protection should also be discussed, because it is important in the context of EADs that ultimately cannot be feasibly eradicated.

We also note that the Discussion Paper does not mention ‘preparedness investment’, which under this model and consistent with the National Biosecurity Committee biosecurity stock take, should be part of ‘prevention’. This acknowledges that industry does invest in the left-hand side of the generalised invasion curve.

Some of the uncertainty around these concepts and what qualifies an issue for asset based protection may be removed by providing more detail around the national significance/interest test.

In the interests of clarification of government responsibilities, we believe that the following additional principles be considered for inclusion:

- Where established onshore pests, diseases or weeds 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.
- 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.

In specific reference to the Policy Principles, we note:

**Dot point 6** – while we recognise that national plans and strategies for nationally significant pests and diseases are an appropriate approach, we note that – as stated above – they may be required to address regional issues.

**Dot point 7** – It is worth noting that the EADRA contains a number of established diseases of national significance (e.g. anthrax, Australia bat lyssavirus and Hendra virus), and this needs to be considered as part of the proposed modernisation of Australia’s approach to managing pests and diseases of national significance. For each of these diseases there is an established process regarding the roles and responsibilities of governments and industries, funding and response policy as set out in the EADRA and the Australian Veterinary Emergency Plan (AUSVETPLAN). Therefore, consultation and transparency with industry on the review of categorisation of such established diseases will be vital.

## **2) Are the proposed policy principles sufficient?**

While we acknowledge that the policy principles as set out in the discussion paper are fair, their application will still need to be negotiated individually on case by case basis with industry and the community.

Some key issues to be addressed include: government budgetary constraints (leading to non-involvement of governments based on lack of funding), prioritisation criteria, etc. None of these are clearly articulated in the discussion paper, which will be required before a clear assessment can be made.

**3) Should listing of established pests and diseases of national significance be for a defined period or open ended?**

AHA believes the listing of established pests, diseases and weeds should be open-ended in that pests, diseases or weeds can be added or removed as they, for any reason, become a priority.

National responses need to be time-based and covered by a management plan and a monitoring and evaluation framework to measure success at an appropriate time scale.

**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?**

We believe that a concerted, fully consultative collaborative effort is required to create and maintain a list of established pests, diseases and weeds. It is also important that this includes a mechanism to agree on established pests, diseases and weeds prioritisation in order to inform resourcing requirements.

It will be vital, in consultation with all relevant stakeholders, to develop clear assessment criteria for both placing a pest, disease or weed on the nationally significant list and also reviewing its requirement to remain on the list or not. The review should be transparent, and conducted by an independent third party against the agreed criteria with agreement obtained from all parties.

To facilitate the creation of the list we recommend that a workshop model similar to the recent APVMA AgVet chemical prioritisation workshop be considered.

**5) What is an appropriate time for such a review?**

AHA recommends that an initial formal review be undertaken within 12 months with a view to reaching agreement at that point on the on-going review process. As noted already it is important though that there is flexibility in the review process and AHA is also supportive of the development of a formal mechanism to enable amending of the list out of session if required.

**6) Are the proposed roles and responsibilities clear, particularly in relation to your role?**

Yes, they are clear, although we note that there is no inclusion of service organisations and the essential role they may play, particularly in the development and operation of partnerships. We also consider that these would need to be re-visited and confirmed on a case by case basis dependent on the proposed management plan for each disease to achieve agreed roles and responsibilities for all stakeholders.

We also note that the roles and responsibilities for service organisations such as AHA or Meat and Livestock Australia are not listed and suggest these be included in the paper.

Another oversight is that while industry is expected to lead in the context of asset based protection, the Australian government should provide leadership amongst governments where there is not an effective national approach and there is a case for applying this principle. This is clearly evident in the eradication and containment phases with some notable historical examples.

However, it must be noted that the roles and responsibilities will still need further consultation with the industry sectors in order to achieve an agreed position.

### **7) Are the proposed roles and responsibilities appropriate and practical?**

From an AHA organisational perspective we believe they are. However, it must be noted that the roles and responsibilities are not listed for a service organisation such as AHA. Negotiating appropriate roles and responsibilities with the industry sectors will then be required – AHA could provide the forum where this can occur.

### **8) What are the issues with establishing and maintaining effective collective action?**

There is a clear need for a collaborative relationship between governments and stakeholders. This sort of relationship will only be built if governments consult widely and meaningfully with industry sectors following recognised public participation principles. For example, the Victorian Auditor-General's Office recently published a reference on public participation in government decision-making ([www.audit.vic.gov.au/publications/20150130-Public-Participation-BPG/20150130-Public-Participation-BPG.pdf](http://www.audit.vic.gov.au/publications/20150130-Public-Participation-BPG/20150130-Public-Participation-BPG.pdf)). In this document, the Auditor-General notes '*public participation is a critical input to government activity, and developing effective strategies, programs and projects*'.

We also recommend that:

- 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 consultation and collaboration, the gathering of meaningful baseline data against which to measure progress and the determination of an effective and sustainable funding model.
- 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.

**Who should lead the process? And should a process be developed in agreement with industry, community and government?**

This will depend on the issue in question, and the number of stakeholders that should be involved. Development of an agreed process is recommended. This may mean that Government should lead to some extent with appropriate engagement of industry for the most effective result.

**9) How can the coordinated approach be best implemented across the various stakeholder groups?**

There is a need to develop and implement a framework which would include resourcing and funding that is agreed to by all parties.

**10) How do you see yourself (or your interest/industry/organisation) contributing?**

AHA would be willing to assist in this process by facilitating and brokering partnerships between government and industry stakeholders during the consultation process, and ultimately assisting in implementing management plans when and where required.

ALFA contribution would be by way of co-ordinating the efforts of the feedlot industry to:

- ensure the list of pests, diseases and weeds is comprehensive and the feedlot industry and individual lot feeder exposure to future funding commitments is appropriate to a cost-effective program in the pursuit of positive outcomes
- promote and undertake collective action based on feedlot industry needs at a local, regional or national level to mitigate impacts of established pests and diseases on feedlot industry assets
- build risk mitigation measures, including containment measures where relevant, into normal feedlot biosecurity management practices
- support research into management and control of established pests and diseases that provides feedlot industry benefit
- support and promote industry-driven or market-driven approaches to management and containment of established pests and diseases where practical and applicable
- promote development of partnerships between government, industry and the community.

**11) Other comments**

Industries need to be engaged and consulted on the proposals contained in this discussion paper, and AHA would suggest that the Industry Forum meetings – held in September and March each year – would be an appropriate avenue for this engagement. Further relevant case studies may be of value.