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Intergovernmental Agreement
on Biosecurity Review Panel

via email: igabreview@agriculture.gov.au

Dear Panel Members

Submission to the Review of the Intergovernmental Agreement on Biosecurity

Australian Pork Limited (APL) is the national representative body for Australian pig producers. It is a producer-owned, not-for-profit company combining marketing, research & innovation and policy development to assist in securing a profitable and sustainable future for the Australian pork industry. APL works in close association with key industry and government stakeholders.

APL welcomes the opportunity to provide a submission to the review of the Intergovernmental Agreement on Biosecurity (IGAB).

Biosecurity matters and Australia's biosecurity is particularly important with the increase in global trade and the movement of people across the world. The Australian pork industry enjoys a high herd health status, with freedom from some of the world's worst pig diseases. Along with governments, the Australian pork industry works diligently to maintain this status both nationally and at a farm-level. Biosecurity is our comparative advantage in the global pork trade – and Australian pork attracts a premium because of its reputation as an exporter of safe food.

The Australian pork industry cannot afford a disease outbreak and the devastating impact of disease can be readily seen in overseas countries such as the USA, where approximately 8 million piglets died from porcine epidemic diarrhea virus (PEDv) in 2014-15. Moreover, if there were an outbreak of porcine reproductive and respiratory syndrome (PRRS) in Australia, conservative appraisals based on modelling estimates that at least10 per cent of infected sows and 50 per cent of piglets would die.

APL works closely with the Australian Government, the pork industry and the broader Australian community on biosecurity awareness and projects to mitigate biosecurity risks. One current project seeks to engage the wider Australian community on the importance of good biosecurity and its role in protecting Australia's pork industry. APL regards public awareness of biosecurity as an important compliance tool.

Maintaining the strength of Australia's biosecurity system requires greater transparency and improved communication. Moreover, better collaboration between industry and governments would streamline efforts, be more efficient in both time and cost and better target additional investment to areas that would deliver additional benefit.

The Intergovernmental Agreement on Biosecurity

IGAB was established as an outcome of the Beale review, to enhance Australia's biosecurity system and strengthen the collaborative approach between the federal, state and territory governments to address Australia's broad range of biosecurity issues. In that regard, IGAB has achieved its objective.

While understanding the purpose of IGAB is for government collaboration, its transparency and engagement with industry could be improved through a more inclusive model that would also improve the effectiveness of IGAB.

APL has attended forums and workshops, such as the Biosecurity Roundtable, which are important for engagement with industry. However, follow-up of actions or outcomes from these is drawn out and often do not demonstrate where or how industry views have been acknowledged or incorporated.

For IGAB to succeed in achieving the objectives presented in the Beale Review it needs to ensure industry is engaged through inclusion, consultation and an adequate feed-back mechanism.

Additionally, IGAB needs to ensure that in being effective it is encouraging and facilitating good, evidence-based biosecurity policies across all jurisdictions. For example, despite NSW being the only state with one confirmed case of swine brucellosis being passed onto humans, WA has regulations in place for testing of swine brucellosis when pigs are moved from other states to WA. This testing requirement is added red tape and regulatory burden, and should be an aspect where IGAB is used to ensure that regulation is streamlined, sensible and appropriately managing biosecurity risks.

While the removal of regulatory burden (red tape) is supported, opportunities to reduce red tape should ensure that this does not present a greater risk to Australia's biosecurity status particularly at the border.

Agreeing to risks, priorities and objectives

The process for determining the priority areas and how they will be addressed is critical to the success of IGAB. There was little, if any, industry consultation and agreement on these priority areas. Industry views on the listing and review process of priority areas should be sought, including how they may be addressed.

Industry is often well-positioned to lead initiatives and collaborative activities, and this should be supported by governments. Industry holds foundational knowledge, has access to up-to-date scientific resources and often has the capacity to conduct research to support priority areas.

Additionally, industry is often better placed than governments to identify risks and the wider impacts they may cause. As an example, it has been assumed saleyards pose a great biosecurity risk. APL recently funded research that found saleyards used for the sale of pigs are a high biosecurity (and an animal welfare) risk for the Australian pork industry. The research project suggests strategies to mitigate the risk through better management practices and alternative methods for the sale of pigs. As an outcome from the study APL has taken the initiative to drive these changes, although responsibility for these risks sit with state governments who hold the compliance responsibility for saleyards.

Governments must better engage industry on how they aim to address priority areas and risks to work cooperatively with industry to develop a satisfactory model before implementation occurs.

Embedded shared responsibility

The IGAB considers biosecurity management a shared responsibility and to strengthen the biosecurity system, it is intended to identify collaborative opportunities, beyond governments.

The Department of Agriculture and Water Resources (DAWR) hosted the National Animal Health Surveillance & Diagnostics Business Planning Workshops to discuss the national animal health surveillance and diagnostic business plan, governance, key priorities and actions; and to identify lead agencies to take responsibility for each of the actions. As a first step to improved cooperation on biosecurity, this initiative is beneficial but requires finalisation.

APL found the focus of these workshops was largely market access. A better outcome would have been to determine each sector's surveillance priorities, and to use this to clearly identify the roles and responsibility of various groups who are best suited to drive key priorities.

Industry have strategic plans and invest to identify appropriate measures and robust systems to manage biosecurity risks. For example, the Australian pork industry has made a substantial investment in production standards and traceability. The Pork Supply Chain Integrity Program (PSCIP) includes traceability (PigPass), quality assurance (Australian Pork Industry Quality Assurance Program or APIQ✓®), Physi-Trace (a robust pork meat traceability system) and the Pork Australian Export Meat Inspection Scheme (Pork AEMIS).

Biosecurity is a high priority for pork producers who view their pig production facilities as quarantine areas, implemented through strict adherence to on-farm biosecurity plans. However, threats include statutory rights of entry (e.g. for reading power meters) and other non-authorised entry (e.g. activists). Often these high risk entries on-farm are not perceived as risky by the various regulators or by those actually entering the farm premises. Most outside the agricultural sector, even those in a regulatory role, have very little understanding of biosecurity or the implications of such cavalier treatment of farm imposed biosecurity requirements. State governments have only begun to realise the risks these pose to on-farm biosecurity and at the request of industry, are now able provide support services particularly for non-authorised entry to farms.

The Australian pork industry, through APL, is a signatory to the Emergency Animal Disease Response Agreement (EADRA). The ongoing support of all governments, as parties to the EADRA, is welcome. However, livestock industries generally seek to ensure that every effort is made to ensure an exotic disease outbreak does not become established, i.e. endemic. Concerns also include where the disease entry occurred because failure in at-border quarantine, or was the response effort managed in such a way that eradication was abandoned.

A major risk currently faced by the Australian pork industry is peri-urban farming including the high potential risk of swill feeding. This is a significant area of duplication, across both industry and governments. Improved collaboration would be most welcome, as has applied in the area of activists where the NSW Government, on behalf of all governments, is leading development of appropriate response plan that will see shared responsibilities for governments and industry.

Funding biosecurity

Governments are responsible for the broader community and environment. There is a significant public good associated with biosecurity, and governments should ensure their funding activities reflect this.

APL acknowledges continuous cost pressures faced by governments and the motivation to recover costs. As a shared responsibility, biosecurity funding must be monitored to ensure cost-shifting from governments to industry does not occur, especially where the shift is inconsistent with the responsibilities of governments, for example by a new pest species or diseases becoming established thereby rendering it an ongoing problem for industry and its producers.

Market access

The 'clean, green and pest and disease-free status' is a significant competitive advantage for Australia and its agriculture industry. However, for the pork industry, a number of competitor countries seek to undermine this asset by putting pressure on DAWR to review the pork biosecurity import risk assessment (Pork BIRA).

Any change to the pork BIRA to allow fresh pork imports, or weaken the cook time and temperature for processed pork, poses a significant biosecurity risk. The government's own research suggests that fresh pork swill fed by small holders (less than eight sows) would be

the mostly likely pathway for an outbreak of foot and mouth disease (FMD). FMD affects all hooved livestock species and would impact widely across agriculture, and threaten valuable export markets for all livestock species.

The role of research and innovation

The Animal Health Committee is a key forum that should be used to better engage in RD&E priorities and where collaborative efforts could be achieved.

A major biosecurity risk is the transfer of antimicrobial resistance (AMR) through the carriage of commensals and pathogenic organisms carrying antimicrobial resistant genes by a number of fomites including feral birds, animals and humans. Hence, studies on AMR should be a cross-sectoral priority. APL has championed a stewardship program for AMR (including an AMR surveillance pilot project funded by DAWR) in collaboration with other intensive livestock industries and some consultation with human health specialists and little oversight from governments.

Governments could focus investment in emerging trends of disease, pests and weeds, including the movements of people, pests and disease, and robust systems to manage this. Future technologies that can be employed to assist with surveillance and biosecurity strategies may be a useful investment option for governments. As an example, investing in big data and the use of algorithms to predict future trends and risks will only work if consultation with industry occurs prior to commencement of a project, and is ongoing throughout its duration. Investment in people with the capability to do this, such as futurists, is not impractical. This would challenge the current thought processes and influence wider thinking to be more future focussed.

Measuring performance of the national biosecurity system

If performance is measured in the establishment of new pests, weeds or disease in Australia then success is no new pests, weeds or diseases. The principles of IGAB state that in practical terms a zero biosecurity risk is unattainable, and thus performance could be measured by improved biosecurity surveillance, detection, a decreased rate of establishment of new pests, weeds and diseases, and successful incursion responses resulting in no new endemic pests, weeds or diseases occur. For the Australian pork industry success is maintaining the status quo, i.e. that no new diseases are introduced given the high-disease freedom of the pig industry in Australia.

Yours sincerely

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