

8 July 2016
Dr Wendy Craik
Chair
IGAB Review Panel
<mailto:igabreview@agriculture.gov.au>

Dear Dr Craik

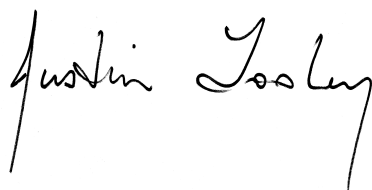
RE: RESPONSE TO IGAB REVIEW PANEL'S DISCUSSION PAPER

As your Panel is aware, Cattle Council of Australia is the peak national body for the Australian grass-fed cattle sector, with its membership comprising direct subscribers and all State Farmer Organisations; the Australian Registered Cattle Breeders' Association and the Australian Cattle Veterinarians' Association are Associate Members.

Much of what is contained in this response to the Panel's Discussion Paper entitled, *Is Australia's national biosecurity system and the underpinning Intergovernmental Agreement on Biosecurity fit for the future?*, was conveyed to the Panel during its interactive industry session in Canberra on Friday 22 April; thank you for providing the opportunity for that discussion.

Cattle Council notes this review is being conducted in two phases, with the first phase involving the receipt of submissions. The Council looks forward to maintaining a high level of interest in the Panel's deliberations and providing further input if necessary during the second phase following release of the Panel's draft findings.

Yours sincerely



for Mr Jed Matz

Chief Executive Officer

Att: CCA's response to Discussion Paper questions



CATTLE COUNCIL OF AUSTRALIA'S RESPONSE TO THE QUESTIONS POSED BY THE IGAB REVIEW TEAM IN ITS DISCUSSION PAPER

Is Australia's national biosecurity system and the underpinning Intergovernmental Agreement on Biosecurity fit for the future?

Summary Comments

1. The initial IGAB (say, 'IGAB Mk1') is supported as an important first step towards formal co-ordination of biosecurity efforts in Australia.
2. 'IGAB Mk 2', which presumably will eventuate in one form or another from this review, must be inclusive of industry.
3. For its part, industry must marshal its resources to provide meaningful, sustained input to a more nationally inclusive biosecurity.
4. Biosecurity continues to grow in importance yet funding for biosecurity programs continues to fall in real terms; in other words, biosecurity in Australia is facing a potential funding crisis.
5. Government withdrawal from the management of endemic diseases in Australia is leading to the depletion of resources that could otherwise be called upon in the event of an emergency disease incursion; this is affecting Australia's level of preparedness.
6. There exists scope for improvements in preparedness for emergency-disease and pest incursions, including using endemic-disease management as a 'training ground', through greater industry/government co-ordination and co-operation in setting and acting on priorities.
7. Surveillance is central to early detection and preparedness; the production sector offers an excellent resource for remote surveillance provided individuals are informed, have access to high-quality broadband for real-time reporting and are rewarded for their efforts (including recognition of in-kind contributions).
8. The Federal and jurisdictional governments can do more for industry through regulatory underpinning of producer-driven initiatives designed to improve the uptake of on-farm biosecurity practices; this would include the cattle industry's Livestock Biosecurity Network (for extension and dissemination) and Livestock Health Declarations (for seller-to-buyer information transfer).

[For the purposes of this submission, "industry" primarily refers to the livestock industry and "biosecurity" takes the meaning defined in the Intergovernmental Agreement on Biosecurity (IGAB): *the management of risks to the economy, the environment, and the broader community, of pests and diseases entering, emerging, establishing or spreading.*]



Specific Responses

QUESTIONS FROM THE DISCUSSION PAPER	CCA COMMENT
The IGAB	
1. Is the IGAB a suitable mechanism to underpin Australia's national biosecurity system in the future (10 or 20 years from now)? Are the consolidated priority areas still appropriate?	<p>Within the Discussion Paper, reference is made to Australia's "highly regarded biosecurity system", "world-class produce", "preferential market access arrangements", "international reputation", etc. These claims have been made possible ostensibly by a combination of the tyranny of distance, government oversight of borders and disease-management programs, and market-savvy producing and exporting sectors.</p> <p>The IGAB has served to strengthen one component of the oft-stated "shared responsibility": the co-ordination of government policy and resources; however, its construct to date has overlooked industry's role. In other words (and putting aside Australia's fortunate geographic isolation), IGAB – and its governing body, National Biosecurity Committee (NBC) – has involved only two (the federal and jurisdictional governments) of the three components necessary for Australia's reputation to remain relatively intact.</p>
2. <i>What are your views on the construct, effectiveness, and transparency of the IGAB? Please provide examples.</i>	<p>IGAB's creation and maintenance since 2012 deserve industry support: bringing together the multitude of governments in this country to encourage a united policy direction helps Australia match it with our many overseas counterparts who have the good fortune of less layers of government. It is now time though to reach further by involving industry more formally. Such an approach would sit well beside numerous other government/industry joint initiatives (e.g., Animal Health Australia (AHA), Plant Health Australia (PHA), SAFEMEAT Partnership and various export-market and R&D advisory groups) that, anecdotally, attract overseas envy.</p> <p>In response to NBC's possible assertion that the livestock industry has been involved through AHA's observer-body status, industry and AHA have stated that AHA is not a representative body of industry. In fact industry collectively is only one of AHA's three membership envelopes (the others being the Federal Government and jurisdictional governments), with Associate Membership being a fourth category. AHA's Industry Forum, which comprises AHA's industry members exclusively, more appropriately represents industry; PHA has a similar structure. Processing, agency, transporting and cargo sectors also have much to offer.</p> <p>For the livestock industry to seek appropriate involvement, it must ensure it is sufficiently resourced to provide meaningful and sustained input. AHA's Industry Forum (AHAIF) is well suited, though poorly funded, for such a responsibility.</p>



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<p>3. What practical improvements to the IGAB and/or its structure would provide for an increased, but accountable, role for industry and the broader community?</p>	<p>This question is best answered in two parts: interim and long term.</p> <p>For the interim, Animal Health Council (AHC) and AHAIF provide useful examples of structures involving appropriate industry/government interface. Here, the respective lead agency sets aside an adequate period of agenda time for the other to interface at face-to-face meetings on important policy matters of mutual interest. Given the status of both bodies in terms of their representation on behalf of their respective members, these high-level discussions can be quite timely and productive.</p> <p>The National Communications Network (which produces nationally consistent public information in response to pest and disease outbreaks) has recently adopted a similar approach.</p> <p>One of the listed Purposes of the IGAB is: <i>As the responsibility for biosecurity management is also shared by industry, natural resource managers, custodians or users, and the community, this Agreement and its schedules identify opportunities for the Parties and these groups to work together to strengthen the biosecurity system</i> [Purpose 2.3]. In spite of this, industry's potential involvement in the IGAB has been seriously underutilised. It is noted that, in reference to the concept of "shared responsibility" and the "biosecurity continuum", the words "industry" or "industries" appear 21 times in the IGAB; it is therefore reasonable to expect industry involvement.</p> <p>In the short term, NBC can interact immediately by adopting the AHC/AHAIF model. Initial meetings can be used to bring industry up to date with most things IGAB; useful discourse should eventuate thereafter.</p> <p>For the longer-term, attention is drawn to the diagram provided to the Review Panel in late April 2016 in which is described a structure for a proposed Biosecurity Consultative Council; this was presented to the Beale Review Panel for consideration. Whether or not the model is as relevant today, the principle is important: inclusiveness. A copy of this model is again provided to the IGAB Review Panel, at Appendix 1.</p>
Agreeing to risks, priorities and objectives	
<p>4. Is the goal, and are the objectives, of Australia's national biosecurity system still appropriate to address current and future biosecurity</p>	<ul style="list-style-type: none"> The <i>Goal</i> of Australia's national biosecurity system, as stated in the IGAB, is to: <i>minimise the impact of pests and diseases on Australia's economy, environment and the community, with resources targeted to manage risk effectively across the continuum, while facilitating trade and the movement of animals, plants, people, goods, vectors and vessels to, from and within Australia.</i> <p>The system's Goal seems appropriate for now and into the future, provided "minimis[ing] the impact of pests and diseases on Australia's economy" includes preventing incursions of exotic pests and diseases.</p>



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challenges?	<ul style="list-style-type: none">• The <i>Objectives</i> of the system as stated in the IGAB are to: <i>provide arrangements, structures and frameworks that:</i><ul style="list-style-type: none">○ <i>reduce the likelihood of exotic pests and diseases, which have the potential to cause significant harm to the economy, the environment, and the community (including people, animals and plants), from entering, becoming established or spreading in Australia;</i>○ <i>prepare and allow for effective responses to, and management of, exotic and emerging pests and diseases that enter, establish or spread in Australia; and</i>○ <i>ensure that, where appropriate, significant pests and diseases already in Australia are contained, suppressed or otherwise managed.</i> <p>The system's Objectives seem appropriate for now and into the future, provided "arrangements, structures and frameworks" are inclusive of industry.</p>
5. In order of importance, what do you see as the most significant current and future biosecurity risks and priorities for Australia and why? Are Australia's biosecurity objectives appropriately tailored to meet these risk and priorities?	<p>In reference to the Meat Industry Strategic Plan¹, the Australian red-meat and livestock sectors have identified money spent on <i>Minimising the impact of emergency</i> [and] <i>endemic diseases</i> as having the highest benefit/cost ratio of all expenditure items through to 2020 and also to 2030. Biosecurity is therefore industry's highest priority.</p> <p>Foot and Mouth Disease (FMD) eclipses all other diseases in terms of threats to our industry. As such, governments and industry have been working periodically to test our systems against predicted requirements should there be an FMD incursion. The basis of this is: If we can handle an FMD incursion we can handle anything.</p> <p>Although we are probably better prepared than most countries around the world and have taken lessons from the 2001 FMD outbreaks in the UK and Uruguay and the 2010 outbreaks in Japan and the Republic of Korea (among others), there is always more to be done.</p> <p>As mentioned under 4 above, biosecurity objectives are sufficiently tailored to meet this challenge; the real question is: Are the objectives being met? The answer is probably, No.</p> <p>With around 200,000 livestock producers in this country, to say nothing of horticulturalists, environmentalists, naturalists, and indigenous and other communities, there come 200,000 pairs of eyes essential to a comprehensive</p>

¹ <http://rmac.com.au/wp-content/uploads/2015/09/150901-MISP-FINAL.pdf>



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	<p>surveillance network throughout Australia. These are underutilised.</p> <p>The National Animal Health and Diagnostics Surveillance Program, which is in its formative stages, will help address some of this shortcoming, assuming it is successful in improving awareness among those potentially able to contribute. It is also important for producers' time being recognised as their 'contribution-in-kind' at the very least.</p> <p>The livestock industry itself has done much to improve its preparedness but, again, more is needed. As an example, the National Livestock Identification System (NLIS) is a world-leading animal-tracing model that potentially allows for real-time tracing of livestock movements – an invaluable asset in a crisis, assuming it is fully functional. Unfortunately the NLIS suffers from poor broadband services in many rural and remote areas and less than ideal retention rates.</p> <p>Industry's Livestock Production Assurance Program has great potential for raising producer awareness around the importance of on-farm biosecurity. Work is now underway to include a biosecurity module within LPA and for LPA to included the use of Livestock Health Declarations.</p> <p>Additionally, while industry funding for emergency disease responses is accommodated (through the current zero-rated levy, which can be triggered by the Federal Government if necessary), recurrent funding for industry's biosecurity initiatives is nearing crisis point. A real example is with Cattle Council's lauded biosecurity-extension initiative, Livestock Biosecurity Network Pty Ltd, which is in urgent need of additional funding. (See more under points 11 to 15). Funding is therefore also a very high priority for industry.</p>
6. Are the components and functions of Australia's national biosecurity system consistently understood by all stakeholders? If not, what could be done to improve this?	<p>Stakeholder understanding of the system's components and functions is gaining ground but from quite a low base. To be fair, biosecurity as a holistic concept has emerged only relatively recently. There is still some debate, for example, around what is actually meant by "biosecurity" – definitions abound.</p> <p>Greater integration of government and stakeholder activities, or knowledge base at least, would assist. This could be led for now by NBC under a revised IGAB that is more inclusive of non-government agencies.</p> <p>An example of industry becoming more knowledgeable about the Federal Government's activities rests with the recent changes to selecting imported goods for thorough inspection: in the past, containers/goods have been randomly selected for inspection, meaning imported products may or may not be chosen for inspection regardless of their source and destination; more recently a risk-based selection process has been adopted that enables the targeting of higher-risk shipments for inspection. Government would benefit from keeping industry updated on</p>



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	the success of this approach but, other than the initial announcement a couple of years ago, nothing has been said.
7. What benefits (or impediments) are there in realising a more integrated national approach to biosecurity, agreed to by key partners in Australia's national biosecurity system?	<p>Government leadership to date has been both a benefit and an impediment to realising a more integrated approach: it's been a benefit because governments have the resources and systems to progress what's needed in strengthening Australia's approach; it's been an impediment in that it has contributed to industry holding back from involvement because "it is all being taken care of and we can't afford it anyway".</p> <p>The dilemma here is that governments are offsetting their decreasing involvement with industry by leaning more heavily on industry participation, yet industry participation will continue to languish because of its lack of funding and associated resourcing. The 'system' is under considerable strain that can't be eased until an integrated government/industry approach is taken and funding shortfalls are addressed. Increased funding would be preferable to decreased biosecurity activities.</p>
8. What form would this best take (for example, a national statement of intent or national strategy)? What are the key elements that must be included? What specific roles do you see industry and the broader community playing in such an initiative?	<p>With the old adage, 'form follows function', an all-out attempt must be made to strategise stakeholders' collective direction and to correct existing shortfalls in funding and resourcing to enable optimum progress. Fundamental for industry is the expansion of the existing funding base without jeopardising other essential non-biosecurity programs.</p> <p>Much of the grass-fed cattle sector's socialised biosecurity funding is funnelled through AHA. In spite of growing concerns around biosecurity threats and lack of preparedness, cattle levies to AHA (\$0.13/transaction) have remained unchanged since 1997², while costs and the demand for new programs have continued to rise.</p> <p>By combining with government departments to effect more co-ordinated, long-term commitments to Australia-wide biosecurity programs, a stronger argument can be mounted for better resourcing for all stakeholders.</p>
Embedding shared responsibility	
9. Are the roles and responsibilities of stakeholders in Australia's national	<p>See comments under 6 to 8.</p> <p>A weakness in the understanding of the current roles and responsibilities lies in the unavoidable evolutionary development of the system. For the livestock industry, the last 'big bang' impact on the Australia's biosecurity</p>

² There is an exception: for the two financial years 2005 and 2006 the levy to AHA declined from \$0.13 to \$0.07, then was resumed at \$0.13.



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<p>biosecurity system clearly and consistently understood? How might this be improved?</p>	<p><i>modus operandi</i> occurred with the creation of the Emergency Animal Diseases Response Agreement (EADRA) in 2001, which followed the incorporation of AHA in 1996. Associated programs and industry/government advisory bodies have evolved as needed since then, with no commensurate increase in funding.</p>
<p>10. What practical actions do you think governments and industry organisations can undertake to strengthen the involvement of industry and community stakeholders in Australia's national biosecurity system? Would increased involvement in decision making on and implementation of biosecurity activities help the adoption of shared responsibility?</p>	<p>AHA has recently completed a thorough development of its Strategic Plan to cover the five years to 2020. While AHA does comprise industry and government members who naturally were involved in the planning process, its focus is on animal industries; likewise, PHA's planning is focused on plant industries. Given 'biosecurity' covers so much more than just plants and animals, is there justification in having an all-in, multi-day 'conference-style' gathering of all stakeholders to move Australia's collective efforts to a new level? Out of such an exercise may come initiatives aimed at co-ordinating not just the efforts of Australia's many governments but also its industries and diverse communities who have the potential to contribute.</p> <p>The growing necessity to deal with weeds is proving a touch-point for such an expansion. Examples of recent co-operation between governments, animal sectors and plant sectors to tackle weed issues include the Red Witch Weed (<i>Striga asiatica</i>) response and the recent NBC workshop on <i>Modernising Australia's approach to established pests and diseases of national significance</i>.</p>
Funding biosecurity	
<p>11. Are the IGAB investment principles still workable? Do they still meet the needs of Australia's national biosecurity</p>	<p>IGAB investment principles are:</p> <ol style="list-style-type: none"> 1. <i>Activity is undertaken and investment is allocated according to a cost-effective, science-based and risk-management approach, prioritising the allocation of resources to the areas of greatest return.</i> 2. <i>Relevant parties contribute to the cost of biosecurity activities:</i>



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system now and in the future?	<p><i>a. Risk creators and risk beneficiaries contribute to the cost of risk management measures in proportion to the risks created and/or benefits gained (subject to the efficiency of doing so), and</i></p> <p><i>b. Governments contribute to the cost of risk management measures in proportion to the public good accruing from them.</i></p>
<p>12. Are governments and industry investing appropriately in the right areas? Are there areas where key funders should be redirecting investment? Can investment in biosecurity activities be better targeted? If so, how? Please provide examples.</p>	<p><i>3. Governments, industry and other relevant parties are involved in decision making, according to their roles, responsibilities and contributions.</i></p> <p>These principles seem appropriate and still workable. To what extent have they been adhered to since 2012?</p> <p>It is not for Cattle Council to provide judgement on whether investment is being efficiently, effectively and accurately sourced and/or targeted; in other words, the extent to which the principles are being adhered to. More important is the <i>process</i> by which these issues are discussed with stakeholders and assessments made as to adherence.</p> <p>With a number of endemic-disease programs, jurisdictional governments have made unilateral decisions to withdraw financial and resource support on the grounds that they no longer have a role in endemic-disease management. Producers have had to pick up the tab or lose their program(s). This has been stark with, for example, general extension services, the national Johne's disease programs and identification-and-tracing services.</p>
<p>13. How do we ensure investments and investment frameworks align with priorities, while being flexible enough to address changing risks and priorities?</p>	<p>While this may be justifiable on beneficiary-pays principles, there remains a strong market-failure argument (to support ongoing taxpayer involvement) that is becoming increasingly more difficult for industry to prosecute successfully.</p> <p>To complicate matters, depending from which jurisdiction the producer comes and whether there exists any political imperative within that jurisdiction, government resources are being provided to help with the collection of state-based levy moneys to be used to offset certain biosecurity-related costs. This has led to a hotchpotch of biosecurity funds around Australia, with each being used for entirely different and, at times, competing purposes. In one case (Queensland), the government has been legally blocked from meeting its producers' request for a levy.</p>
<p>14. Are current biosecurity funding arrangements still appropriate to meet the needs of Australia's national biosecurity</p>	<p>As mentioned under 7/8 and 9/10 above, biosecurity funding arrangements applying today have evolved over time and are now to be found wanting, for governments and industry.</p> <p>In terms of governments, the importance of agriculture to the national and regional economies seems to have been diminishing for decades in the eyes of treasury departments; 'biosecurity', being a mere component of agriculture,</p>



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system, now and in the future? What might an alternative or novel funding model encompass?	<p>fares even worse. For industry, there is very little willingness on the part of its leaders to press for increases in levies, even when livestock prices are at record levels, this in spite of 'biosecurity' becoming increasingly understood as critically important.</p> <p>There is an urgent need for collective (industry and government) action aimed at determining Australia's true biosecurity priorities and pressing for a funding model to accommodate them.</p> <p>For the beef-cattle sector, several potential mechanisms present themselves as able to service the collection of a biosecurity-specific national levy:</p> <ol style="list-style-type: none">1) a redistribution of the current 'take' from the \$5/adult head Cattle Transaction Levy (CTL) to ensure biosecurity has its own funding stream. This additional stream can be collected and managed through AHA or the Cattle Disease Contingency Fund (CDCF) Trustee. For this to occur, other recipients of the CTL would lose out;2) an addition to the \$5 CTL, with the extra funds collected and managed through AHA or the CDCF Trustee; or3) use of the current zero-rated emergency response levy such that the Federal Government agrees to its increase from zero to a level agreed necessary to cover industry's essential biosecurity activities. <p>With all three options, the Government's Levy Raising Principles and Guidelines (P&Gs) would need to be met. This is a significant problem for industry, which has been lobbying for some time to have the P&Gs 'softened' to make them more practical and workable; there has been no change to date.</p>
15. What can be done to ensure an equitable level of investment from all stakeholders across Australia's national biosecurity system, including from risk creators and risk beneficiaries?	<p>In attempting to answer this question, reference is made to the National Farmers' Federation submission to the NBC dated 31 July 2015 (see Appendix 2). Of particular relevance is the description on p. 2 under, <i>Maximising returns from biosecurity investments</i>, where an appropriate description and diagram around funding under the 'market failure' principle are presented, and on p. 4 under, <i>Proposed roles and responsibilities of government and other stakeholders</i>, where risk creators are discussed.</p> <p>In essence, the Generalised (or Biological) Invasion Curve created by the NBC has been accepted by NFF and Cattle Council as a logical base for discussions around responsibilities and funding. Governments have a far more effective role to play on the left end of the curve and landholders (which include governments in some circumstances) more on the right.</p>



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	<p>In determining beneficiaries, NFF added one concept important to the 'funding equation': the recognition that <i>industry</i> (rather than the community as a whole) may be the beneficiary from a program that might otherwise be beyond the capacity for private funding because of market-failure principles applying; this would give justification for levy funds (as against taxes or private moneys) being employed.</p> <p>Regarding risk creators, NFF urged discussion around the need for a punitive approach for risk creators who either unnecessarily cause the spread of unwanted pests, diseases or weeds or inhibit the management of them through lack of care or engagement, and whether special attention to 'fringe groups' and/or multi-land users is needed in developing management and control strategies at the regional level.</p>
Market access	
16. Are market access considerations given appropriate weight in Australia's national biosecurity system? What other considerations also need to be taken into account?	<p>Australia has to play a careful balancing act between protecting our own industries and communities from incursions and pressing for access to foreign markets for our exports on which we rely so heavily. Cattle Council contends that Government meets this challenge well. This is probably reflected in the criticism from foreign governments that the Australian Government is too close to industry when determining its trade policies and criticism from Australian industries that the Government can be too aligned with its international obligations for Australia's long-term good.</p> <p>On the latter (industry's opinion), a greater integration of industry into biosecurity-related policy making can improve the level of understanding and engagement by industry in relation to international trade imperatives and the balancing act required of Government. This is not to discount Australia's priority to keep unwanted organisms out where possible.</p>
17. Are there ways governments could better partner with industry and/or the broader community to reduce costs (without increasing risk), such as industry certification schemes?	<p>Industry contends that governments could and should play a greater role in supporting industry-driven biosecurity programs.</p> <p>As discussed under 11/12/13, governments, particularly at jurisdictional level where interface with industry is pronounced, have moved further and further away from direct involvement in, for example, endemic-disease management and extension services. Industry has accepted this as an unwelcome reality and has recognised the cost savings this has delivered to these governments at industry's expense. In return, industry has made requests for greater regulatory backing (where appropriate) to assist with the implementation of, and compliance with, its disease-management and quality-assurance programs. Jurisdictional governments have generally refused or, at</p>



QUESTIONS FROM THE DISCUSSION PAPER	CCA COMMENT
	<p>best, shown great reluctance. Making livestock Health Statements/Declarations mandatory is a case in point. The perception that jurisdictional governments continue to ‘take’ and not ‘give’ is raising unnecessary animosity from industry; a more co-operative approach would benefit Australia’s biosecurity efforts overall, with very little added costs.</p> <p>Cattle Council continues to support its own initiative, Livestock Biosecurity Network Pty Ltd, as an important means of filling the void left with the departure of jurisdictional governments from the provision of extension services. Here is a great opportunity for an industry/government partnership that will allow industry to leverage its meagre funding and government to maintain an important presence.</p>
18. How can the capacity and capability of surveillance systems (including diagnostic systems) underpinning Australia’s national biosecurity system be improved?	Mentioned under 5 is Australia’s proposed National Animal Health Surveillance and Diagnostics Program, which is in its formative stages. Members are being sought for an appropriate management/implementation group to guide stakeholder engagement against an accepted business plan.
The role of research and innovation	
19. Which specific areas of Australia’s national biosecurity system could benefit from research and innovation in the next five, 10 and 20 years and why? Please provide examples.	<p>The National Animal Biosecurity RD&E Strategy was established to deal with these questions. If progress in these areas is found wanting, perhaps the Strategy and its management structure require review.</p> <p>In a very general sense, areas that would benefit from research and innovation would include planning; surveillance; data collection and analyses; emergency preparedness; sound and well-funded policy-making platforms; endemic disease management (doubling as a ‘training ground’ for emergency preparedness); international intelligence gathering; rapid access to emergency veterinary drugs, vaccines and chemicals; improved diagnostic tests; improved availability and use of modern communications technology; etc.</p>
20. How can coordination of biosecurity-related research and innovation	

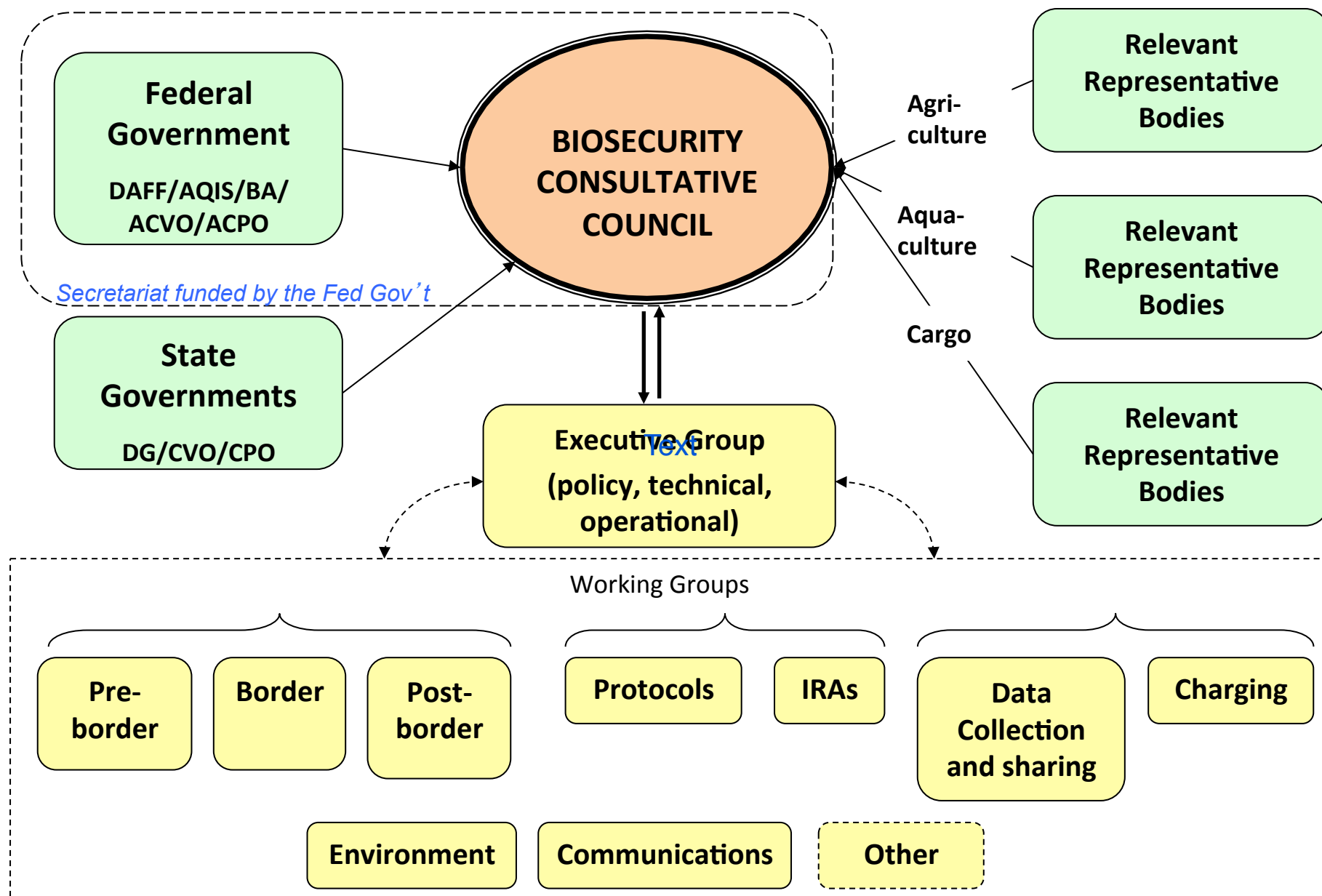


QUESTIONS FROM THE DISCUSSION PAPER	CCA COMMENT
activities be improved?	
21. How can innovation (including technology) help build a more cost-effective and sustainable national biosecurity system?	
Measuring the performance of the national biosecurity system	
22. What does success of Australia's national biosecurity system look like? How could success be defined, and appropriately measured (that is, qualitatively or quantitatively)? What, if any, measures of success are in use?	<p>Measures of success will differ across the biosecurity continuum. The only given is that baseline data and success measures are necessary to gauge progress. One of the tasks under IGAB Mk2 must be to devise such measures.</p> <p>Historically, the eradication of bovine brucellosis and tuberculosis from the Australian cattle herd was a success measure met with international renown. Management of Johne's disease in the livestock industry is an example of a far more difficult set of circumstances.</p> <p>Cattle Council is working with its extension arm, Livestock Biosecurity Network Pty Ltd, to pursue success measures around on-farm adoption of biosecurity practices. Other organisations, such as livestock Research and Development Corporations, have their own sets of success measures, and there are measures within the National Livestock Biosecurity RD&E Strategy Framework.</p> <p>In other words, by bringing Australia's biosecurity fraternity together, relevant performance measures can be aggregated into a meaningful, national set against which all players can assess their progress.</p>
23. What would be required to ensure data collection and analysis meet the needs of a future national biosecurity system? Who are the key data and expert knowledge holders in the national biosecurity	<p>In the main, data are collected at jurisdictional level. For the livestock industry, this has been loosely collected through the AHA-managed National Animal Health Information System, but it isn't necessarily capturing all relevant data nor is it able to standardise the system for data collection.</p> <p>One of the objectives of the National Animal Health Surveillance and Diagnostics Program Business Plan (referenced in 5 and 18) is <i>to enhance the collection, management and effective use of animal health surveillance information</i>.</p> <p>With \$200m allocated by the Federal Government in 2015 to improve biosecurity surveillance in Australia, data</p>



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system?	collection and analysis methods must form an important part of Australia's future biosecurity strategy and hence expenditure. Significant funding still exists under this DAWR-managed program over the next four years; a careful examination of progress to date and plans for the future would benefit the IGAB Review Panel in drawing recommendations as to how funding might be well targeted.
24. How can existing or new data sets be better used? How might data be collected from a wider range of sources than government?	





Addresses: funding of 'continuum' by Gov't; ownership; leadership; joint planning; communications; consultation

Considerations: size & manageability (Chairman); overseas reaction; potential antagonists; legal entity or not; proactive/reactive function, or both

APPENDIX 2



31 July 2015

National Biosecurity Committee Secretariat
Department of Agriculture
GPO Box 858
Canberra ACT 2601

RE: Modernising Australia's approach to established pests and diseases of national significance

National Farmers' Federation (NFF) is the peak body representing farmers and the broader agriculture sector across Australia and is one of Australia's foremost and respected advocacy organisations.

NFF's membership comprises the lead farmer organisations from the jurisdictions and a wide range of national commodity councils.

Australian farmers and the agribusiness sector underpin Australia's food security and contribute to global food and fibre security, directly through production and indirectly through transfer of knowledge and skills to other nations. The continued profitability of farm businesses underpins the ability of the sector to expand and take advantage of the opportunities of a growing global population with an ever-increasing demand for high-quality, safe food.

Please find attached NFF's submission to the National Biosecurity Committee in response to its discussion paper entitled, *Modernising Australia's approach to established pests and diseases of national significance*. This submission is presented on behalf of all NFF's member organisations, some of which may also have chosen to submit under their own letterhead.

Yours sincerely

A handwritten signature in black ink, appearing to read "Ron Cullen".

Mr Ron Cullen
Chairman
NFF's Biosecurity Taskforce
Att.

NATIONAL FARMERS' FEDERATION SUBMISSION TO THE NATIONAL BIOSECURITY COMMITTEE ON ITS PAPER ENTITLED:

MODERNISING AUSTRALIA'S APPROACH TO ESTABLISHED PESTS AND DISEASES OF NATIONAL SIGNIFICANCE

31 JULY 2015

Introduction

National Farmers' Federation (NFF) acknowledged the timeliness of the National Biosecurity Committee (NBC) discussing new ideas to manage established weeds, pests and diseases that have a significant impact at a national level.

Roger Beale AO and his Panel, in their 2008 Report, *One Biosecurity: a working partnership*, emphasised the importance of a true partnership when dealing with matters of biosecurity in Australia:

The central theme is the development of a seamless biosecurity system that fully involves all the appropriate players—business, other nations, the states and territories and the Australian community—across pre-border, border and post-border risk management measures.

It could be argued that, since the Beale Report, strong partnerships have been forged between the various levels of government; however, for the most part these have excluded “the Australian community” and industry organisations.

Recent steps have been taken by the NBC to correct this anomaly: industry bodies are now invited to attend components of NBC meetings and the NFF has been afforded observer status on the governments' National Communications Network.

These recent changes are structural in nature and important to appropriate policy development covering matters of relevance to industry. However, the real challenge for achieving a true and successful partnership lies in the capacity of all governments in Australia to work equally with industry in monitoring and managing existing pests, diseases and weeds and participating in programs around preventing and/or responding to incursions of unwanted pests, diseases and weeds.

In developing the first national framework for managing established pests and diseases of national significance under the Intergovernmental Agreement on Biosecurity (IGAB), the NBC recognises that “*Industry and landholders know best how to manage biosecurity threats on their property or affecting their industry*” and that they are well positioned “*to lead initiative and collective action, with the support of governments.*” [Rona Mellor, Department of Agriculture Media Release, 1 June 2015]

Unfortunately, as is so often the case, funding is, and will continue to be, an issue; nevertheless, by approaching biosecurity in an appropriate manner and in partnership with governments, effectiveness can be maximised and expense minimised. Should added financial responsibility be required of industry, a co-operative approach to how such funds are to be raised and the extent to which governments recognise their obligations to the community and as landholders need thorough discussion and agreement.

With production losses quoted by the Department at more than \$620 million per annum (2009) attributable to pest animals and a further \$4 billion per annum (2004) in costs associated with weeds in Australia, there appears strong justification for collective action. The emphasis must be on *collective*.

Producers have much to offer, particularly with their knowledge and experience around dealing with the chronic impacts of pests, diseases and weeds on their productivity and profitability.

The proposed framework to address established pests and diseases of national significance

The following comments relate to the headings and points within the NBC Discussion Paper.

Maximising returns from biosecurity investments

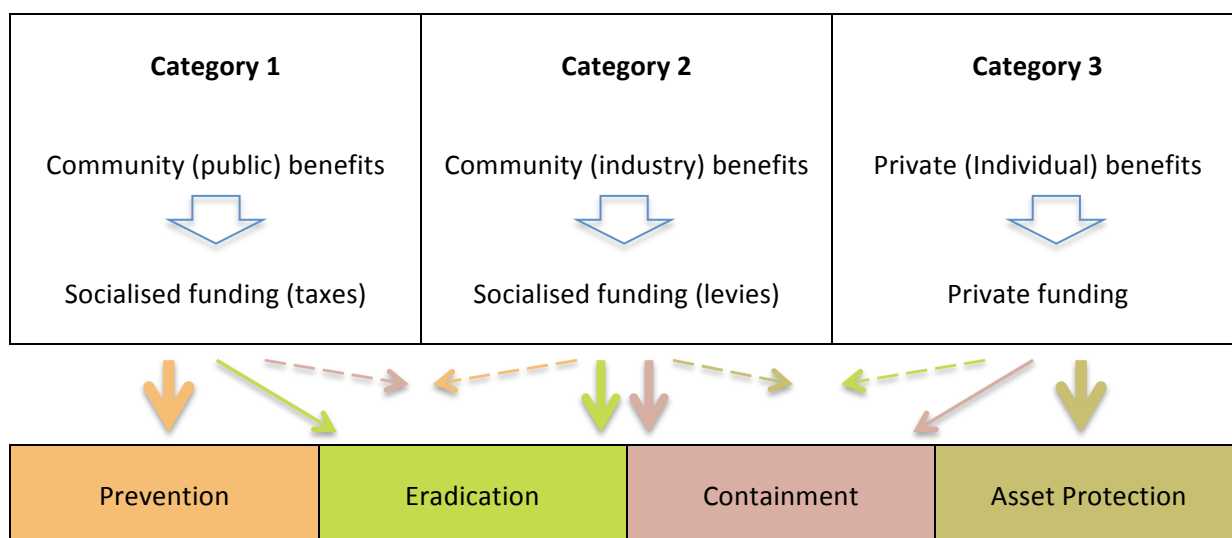
Prior to addressing the specific questions posed in the paper, comment is offered around the basic tenet behind the overall proposal. This is summarised quite neatly through the use of the “generalised invasion curve” on page 5 and the paragraph immediately following:

Public benefit from protecting private assets is generally lower, particularly compared with other activities where government can play a role such as prevention or early detection of incursions. The benefits of managing an established pest or disease accrue predominantly to the owner of the land or the owner of the asset, so asset-based management may be the most cost-effective for an individual and/or as the basis for collective action by a community or industry.

The principle is sound. It is based on ‘beneficiary pays’ where, it is argued, greater benefit for the community (i.e., taxpayer) comes from Prevention while the more direct benefit for landholders comes from Asset-Based Protection; hence the justification for governments spending more than industry at the Prevention end of the scale and industry spending more than governments at the Asset Protection end (noting that governments will play some role in protecting their own assets.)

An additional way of presenting this concept that adds a different ‘flavour’ is to overlay it with the ‘market failure’ principle. (This is mentioned later in the NBC paper but only briefly.) There will be times, for example, when asset protection will be beyond the capacity of individual private landholders even though they may be the primary beneficiaries, meaning collective action would be necessary and socialised funding required.

This is reflected in the diagram below where three clear categories of funding are shown. Categories 1 and 2 are the two forms of socialised funding appropriate to the market-failure principle, with funding from these categories allocated according to the extent to which the broader community benefits (hence taxpayer funding) or the industry community benefits (hence levy payer funding).



Juxtaposing the three Categories against the four pillars from the NBC diagram helps to demonstrate an appropriate flow of funds: expenditure of taxpayer funds (Category 1) tends to be more justified

on the left of the graph than on the right, with the reverse applying to private funds (Category 3); the expenditure of levy funds (Category 2) is justifiable where the benefits would flow predominantly to individual producers but where market failure exists, i.e., where individual producers would be unable or unwilling to fund initiatives in their own right.

Of course, there are occasions when governments, as responsible landholders themselves, must be the primary funders of asset-based protection. (Again this is acknowledged in the NBC paper.) Taxpayer funds are justified in such circumstances under the principle of beneficiary pays because it is the taxpayer, in reality, who owns the assets over which the governments have custodianship. NFF is particularly keen for this to be acknowledged regularly by governments and for them to work enthusiastically with private land/asset holders when managing established pests, diseases and weeds of national (*and* regional) significance.

In terms of calculating who contributes how much and to what, it will be important to acknowledge in-kind contributions, not just from governments but also from private landholders who spend the bulk of their work as carers of the land and their livestock.

Proposed Policy Principles

1. *Are the proposed policy principles appropriate and practical?*
2. *Are the proposed policy principles sufficient?*

Given the focus of this section on asset-based protection and based on the diagram on the previous page, NFF considers the proposed policy principles to be appropriate.

In terms of the list being sufficient, the following additional principles are presented for consideration:

- a) where onshore pests, diseases or weeds are established but 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;
- b) as landholders in their own right, governments have a lead role in managing established pests, weeds and diseases harboured in community assets (where impacts are less significant) and preventing their spread¹
- c) 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.

REASONS:

This section does give the impression, at least initially, that landholders will have to bear most of the responsibility for minimising impacts ("*...onshore management of established pests and diseases focuses on asset-based protection to minimise impacts*"). While it is stated that "*government gives priority to supporting industry and community leadership and actions*" and "*governments will work with stakeholders to support innovation for more effective pest and disease management*", it is unclear what this means. The addition of the above principles (or something similar) would provide an acknowledgement that governments will maintain an over-arching responsibility 'beyond the farm gate'.

As a general comment, the policy principles as they stand are quite broad; further comment from NFF may be warranted once the detail behind the points becomes clearer².

¹ Examples include environmental weeds escaping to agriculture; weed seeds and non-productive, introduced grass seeds spreading by vehicles traversing private properties or reserves; feral cats impacting on nearby conservation areas; crop diseases / pests harboured in headlands or nearby bushland

Proposed national significance / national interest test

3. *Should listing of established pests and diseases of national significance be for a defined period or open ended?*
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?*
5. *What is an appropriate time for such a review?*

In answer to these questions, NFF believes:

- a) listing of established pests, diseases and weeds should be open-ended, with the criteria for future listing firmly agreed;
- b) a model worth considering for determining and reviewing the list is that used recently by the Rural Industries Research and Development Corporation (RIRDC) for the Australian Pesticides and Veterinary Medicines Authority (APVMA) for prioritising agvet chemicals / animals combination for upcoming attention; and
- c) following determination of the initial list and a formal review within 12 months, the list and priorities should be reviewed biennially, with the opportunity through some formal mechanism of amending the list out of session if required.

REASONS

Of more importance than the list itself is the period for its review and the flexibility to add and subtract new items when deemed necessary. Having said this, a concerted effort to establish the list in the first instance is important. Part of the establishment process should be discussion around prioritisation of resource usage, or at least methodology for establishing prioritisation. Unless a pest, disease or weed is eradicated (and hence dropped from the list), only the prioritisation should be amended from review to review, meaning the list is kept as an open-ended 'inventory'.

In the opinion of a number of attendees, the approach adopted recently (June 2015) by RIRDC for prioritising APVMA's upcoming work program in terms of establishing label requirements for certain agricultural and veterinary chemicals worked very well. By reports it was based on a long-held practice in the US, and more recently Canada, for the same purpose. Under the watchful eye of excellent facilitators, it made a very difficult task quite manageable. To expedite an outcome, plant and animal industries were represented at separate workshops. An annual review is being considered. This concept forms the basis for the comments under (b) and (c) above.

In addition to listing important pests, diseases and weeds, there needs to be agreement on desired outcomes and necessary actions to achieve such outcomes.

Proposed roles and responsibilities of government and other stakeholders

6. *Are the proposed roles and responsibilities clear, particularly in relation to your role?*
7. *Are the proposed roles and responsibilities appropriate and practical?*

In answer to these questions, NFF believes the proposed roles and responsibilities of each group require some clarification (see below).

² For example, where there is 'national interest', will there be an associated national management plan or strategy? If so, what will it look like and how will it fit in?

REASONS

As the concept evolves, greater clarity is expected around such things as:

- the roles and responsibilities for industry;
- who is responsible if a particular strategy fails;
- definitions for stakeholder groups and what is expected of them; and
- the process and approach when some parties refuse or lack enthusiasm to participate.

NFF appreciates the acknowledgement by governments that:

- as landholders in their own right, they are equally responsible for asset management where relevant;
- industry organisations and community groups have an important role in promoting collective action, supporting relevant research and development and providing industry input into identifying pests, diseases and weeds of national significance; and
- risk creators need particular attention.

Suggested additional commentary under this section includes discussion around the need for a punitive approach for risk creators who either unnecessarily cause the spread of unwanted pests, diseases or weeds or inhibit the management of them through lack of care or engagement, and whether special attention to 'fringe groups'³ and/or multi-land users⁴ is needed in developing management and control strategies at the regional level.

What would change?

Suggested changes for the future management of pest, diseases and weeds being put in this paper by the NBC are refreshing and eminently supportable. NFF 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"*.

Benefits of a co-ordinated approach

8. *What are the issues with establishing and maintaining effective collective action?*
9. *How can the coordinated approach be best implemented across the various stakeholder groups?*
10. *How do you see yourself (or your interest/industry/organisation) contributing?*

In answer to these questions, NFF believes:

- a) 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 consultation⁵, the gathering of meaningful baseline data against which to measure progress and the determination of an effective and sustainable funding model;
- b) 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; and
- c) its contribution would be by way of co-ordinating the efforts of its member organisations to

³ Fringe groups would cover, but not be limited to, peri-urban farmers

⁴ Multi-land users include users of land for agricultural and resource purposes simultaneously

⁵ All relevant industries, including small niche industries, should be consulted.

ensure the list of pests, diseases and weeds is comprehensive and industry's and individual-producers' exposure to future funding commitments is appropriate to a cost-effective program in the pursuit of positive outcomes.

REASONS

The following sentiment is espoused in the NBC paper: *"The proposed approach would mean interventions would be cost-effective and driven by outcomes (such as asset protection and damage mitigation), rather than by inflexible and expensive activity-based designs (such as reliance on regulation). It would also enable governments to make more strategic investments."*

While NFF supports this approach in the main, it is concerned to ensure:

- a balance is found between policies affecting few landholders on large properties with those affecting many landholders on small properties;
- consultation between environment and livestock groups is conducted in a spirit of co-operation for the benefit of Australia generally; and
- an appropriate model is adopted such that the theory of co-operation between all interested parties is converted to practice.

Of the case studies provided in the NBC paper, the National Wild Dog Action Plan most exemplifies what is being suggested as the way forward. A more recent example lies with the strategy recently developed for collective action to eradicate Red Witch Weed, or *Striga asiatica*.

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