Comments on the IGAB Review from the *Forest Health and Biosecurity Subcommittee*

The Forest Health and Biosecurity Subcommittee (FHaB) is a technical subcommittee under the AFPA (Australian Forest Products Association) Resources Chamber. It comprises both technical experts in forest health and biosecurity as well as key industry representatives with experience and knowledge in this area.

The committee members are:

Industry	**Technical**	**Observers**

Following are individual answers to the 24 questions in the IGAB Review Discussion Paper.

Yours Sincerely

Angus Carnegie

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 (below) still appropriate?
    1. National decision making and investment
    2. National emergency preparedness and response
    3. Established pests and diseases of national significance
    4. Surveillance and diagnostics
    5. Information management, and
    6. Communications and engagement.

FHaB believe that the consolidated priority areas are still appropriate to enhance Australia's biosecurity system.

2. What are your views on the construct, effectiveness, and transparency of the IGAB? Please provide examples.

FHaB is unaware of how extensively the forest industry was consulted in the original development of the IGAB, and therefore is unable to comment on how transparent the original process was.

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?

An "increased and accountable" role for industry implies direct industry funding for national biosecurity. The forest industry is likely to be prepared to fund its "fair share" of national biosecurity, as part of the "shared responsibility", but it is unclear what other forest stakeholders are also prepared to fund biosecurity. For example, are environmental agencies (who manage conservation forests) committed to fund and be engaged in biosecurity (evidence from the myrtle rust incursion indicate they are not fully committed); and are local councils (who manage amenity forests) prepared to be actively engaged. Note that the forest industry already contributes substantially to biosecurity, through high risk site surveillance at ports-of-entry (in NSW), plantation surveillance, and funding of about half of Australia's key technical expertise. More transparent accountability of all stakeholders would increase the likelihood of greater industry involvement.

Agreeing to risks, priorities and objectives

4. Is the goal, and are the objectives, of Australia's national biosecurity system still appropriate to address current and future biosecurity challenges?
    - The **goal** of the national biosecurity system is to minimise the impact of pests and diseases on Australia's economy, environment and the broader community.
    - Three **objectives** support the goal of the national biosecurity system. These are providing arrangements, structures and frameworks that:
        - 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
        - prepare and allow for effective responses to, and management of, exotic and emerging pests and diseases that enter, establish or spread in Australia, and
        - ensure that (where appropriate) significant pests and diseases already in Australia are contained, suppressed or otherwise managed.

FHaB believe that the goals and objectives of Australia's national biosecurity system are still appropriate to address current and future biosecurity challenges, but believes the forest industry could play a greater role in assisting decision making around activities to achieve these objectives. For example, sirex wood wasp (*Sirex noctilio*) is a pest of national significance and

is managed cooperatively across Australia (including national coordination of research activities funded by industry), providing a good example for other industries to model.

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?

FHaB has recently surveyed the forestry industry and technical experts and identified the most significant current and future biosecurity risks and priorities:

1. Lack of adequate surveillance at high risk ports-of-entry (major ports, QAPs) for forestry pests of biosecurity concern, with no nationally agreed or standardised surveillance program.
2. The need for a *National Forest Biosecurity Coordinator* to assist in implementation of priority actions identified by industry and government, including coordinating and collating surveillance data, developing industry training material, liaising with government etc.
3. Declining capacity in forest biosecurity technical expertise, with neither government or industry taking responsibility for succession.
4. Lack of adequate training of industry staff in aspects of biosecurity, including pest detection and biosecurity response processes.
5. A need to improve our ability to respond to incursions, including identifying risk pathways to target surveillance resources and developing *Generic Pest Response Plans* to expedite response activities.

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?

There is not enough transparency regarding stakeholder responsibilities within Australia's biosecurity system. If industry is being asked for greater involvement, are other stakeholders also being asked for greater involvement, and is the work currently being conducted by industry (e.g. surveillance, funding technical expertise) being accounted for.

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?

One of the biggest impediments to improving biosecurity is a transparent and equitable funding model for all stakeholders to be involved in forest biosecurity. Note that the forest industry already contributes substantially to biosecurity, through high risk site surveillance at ports-of-entry (in NSW), plantation surveillance, and funding of key technical expertise. More transparent accountability of all stakeholders would increase the likelihood of greater industry involvement and realise substantial benefits to Australia.

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?

The key elements of a more inclusive and better biosecurity system would be greater involvement by all stakeholders. Industry is an easy target for "shared responsibility". However, in forestry, there are many other stakeholders, including environmental agencies and local councils, not to mention timber-in-service. A transparent analysis of the risks and benefits of each of these stakeholders would provide a clearer picture of who should be asked to contribute to improving forest biosecurity in Australia.

Embedding shared responsibility

9. Are the roles and responsibilities of stakeholders in Australia's national biosecurity system clearly and consistently understood? How might this be improved?

A continual theme in answering many of these questions is the "shared responsibility", and the uniqueness of forestry with respect to stakeholders. In grains, or rice, or beef, there is a single identifiable industry. But in forestry, there is industry (plantations & commercial native forests) but also environmental agencies (conservation forests), governments (forests on crown lands) and local councils (amenity forests). If industry is being asked to "share responsibility", are all these stakeholders all being consistently asked to share in the funding and responsibilities of forest biosecurity? A major threat to forestry is the lack of awareness and "ownership" of amenity planting, including windbreak plantings (e.g. note the prevalence of windbreak plantings infested with giant pine scale in Melbourne).

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?

Australia's forest industry already contributes substantially to the national biosecurity system, through surveillance and funding of technical expertise. More transparent identification of relevant stakeholders, and how they also contribute, may result in an increase in industry involvement in biosecurity. A practical action to strengthen industry involvement would be for government to identify all relevant stakeholders and provide a transparent analysis of how each stakeholder is currently being asked to, and will be in future, share the responsibility. Another action may be the involvement of an industry representative (e.g. a National Forest Biosecurity Coordinator) being more involved in decision making on key aspects of biosecurity that may impact forestry. Another practical action that would strengthen biosecurity would be greater and formal interaction and engagement between state biosecurity agencies and DAWR Operational Science Services Group, including data collection and reporting.

Funding biosecurity

11. Are the IGAB investment principles (below) still workable? Do they still meet the needs of Australia's national biosecurity system now and in the future?
    1. 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.
    2. Relevant parties contribute to the cost of biosecurity activities:
       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
       b. Governments contribute to the cost of risk management measures in proportion to the public good accruing from them.
    3. Governments, industry and other relevant parties are involved in decision making, according to their roles, responsibilities and contributions.

The FHaB agree that the investment principles still meet the needs of Australia's national biosecurity system. However, we believe some clarity and transparency is needed regarding who actually *are* the "risk creators and risk beneficiaries" and how they actually "contribute to the cost of risk management". Furthermore, although we believe that the "public good" of natural forests is relatively well defined, the public good of plantation forests, especially *Pinus* spp., is less clearly defined and not well accountable within government-based calculations of the costs of risk management. For example, the public use of pine plantations, the use of pine trees as farm windbreaks and amenity trees, the contribution of pine plantations to regional (and therefore national) economies.

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.

FHaB acknowledges the "reductions to core government biosecurity resourcing—overall financial and staffing levels—across all levels of government is placing further pressures on the national biosecurity system to manage biosecurity risks" as detailed in the IGAB Review. However, unlike other agricultural sectors (plants and animals), the forest industry is the primary funding source of a lot of the technical expertise in Australia, with national experts employed directly by growers. It is unclear as to whether this is fully appreciated by government biosecurity agencies.

The FHaB recently produced a *Framework for National Biosecurity Surveillance of Exotic Forest Pests* which identifies priorities for biosecurity activities and research. Priority areas for funding included a national biosecurity coordinator, high risk site surveillance, training for industry, analysis of the costs and benefits of funding biosecurity, and pathways and pest risk analyses. The Department of Agriculture and Water Resources is funding a project to discuss priorities and identify funding options. A key component of the project is a national forest biosecurity workshop in August 2016, which will include senior industry representatives, Chief Plant Protection Officers, funding bodies and technical experts. This work is aimed at ensuring appropriate investment in forest biosecurity spending.

13. How do we ensure investments and investment frameworks align with priorities, while being flexible enough to address changing risks and priorities?

See above comments regarding the *Framework for National Biosecurity Surveillance of Exotic Forest Pests* and national forest biosecurity workshop.

14. Are current biosecurity funding arrangements still appropriate to meet the needs of Australia's national biosecurity system, now and in the future? What might an alternative or novel funding model encompass?

The National Emergency Biosecurity Response Agreement (NEBRA) "provides for responding to emergency incidents that primarily impact the environment and/or social amenity and where the response is for the public good" and any response under NEBRA is funded by government. However, with forestry, there is less of a clear definition between the benefits to industry (commercial plantations) and the public good benefits of amenity forests. In the recent giant pine scale emergency response, the benefits of eradication to the public good (amenity) forests was seen by government as significantly lower than the benefits of eradication to the commercial forests. A more clearly defined benefit to the public good/amenity forests is needed to make this process more transparent.

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?

There is a need to clearly identify all risk creators and risk beneficiaries to better enable a more equitable split of investment amongst all stakeholders.

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?

FWPA recently (September 2015) commissioned a report identifying priorities for research to assist in log exports from Australia (*Investment Plan: Research needs and priorities for Australian log exports and woodchip exports*). A key recommendation was to "reduce unduly onerous phytosanitary requirements" for both hardwood and softwood log exports. There are inconsistencies in requirements for different markets and the requirements are geared towards agricultural products (e.g. pre-loading inspections of log vessels for rust flakes within holds is another inappropriate consequence of wood product exports being subject to the same requirements as grains).

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?

18. How can the capacity and capability of surveillance systems (including diagnostic systems) underpinning Australia's national biosecurity system be improved?

A coordinated and nationally agreed (science-based) biosecurity surveillance program may assist in Australia being able to declare pest area freedom for pests of concern to export countries.

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.

As identified above, the FHaB recently produced a *Framework for National Biosecurity Surveillance of Exotic Forest Pests* which identifies priorities for biosecurity activities and research. Priority areas for funding included a national biosecurity coordinator, high risk site surveillance, training for industry, analysis of the costs and benefits of funding biosecurity, and pathways and pest risk analyses. The Department of Agriculture and Water Resources is funding a project to discuss priorities and identify funding options. A key component of the project is a national forest biosecurity workshop in August 2016, which will include senior industry representatives, Chief Plant Protection Officers, funding bodies and technical experts.

20. How can coordination of biosecurity-related research and innovation activities be improved?

For forest biosecurity, a *National Forest Biosecurity Coordinator* could assist in coordinating and collating biosecurity activities and data and identifying research needs and disseminating outcomes.

21. How can innovation (including technology) help build a more cost-effective and sustainable national biosecurity system?

An example of innovation could be the testing of remote traps to assist in port-environ surveys or remote area surveillance (e.g. https://grdc.com.au/Media-Centre/Ground-Cover/Ground-Cover-Issue-121-Mar-Apr-2016/Smart-traps-to-provide-pest-early-warning).

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?

In the forest sector success would mean the commercial, environmental and amenity sectors each actively contribute to, and are engaged in, forest biosecurity activities and decisions. Success would also include the absence of incursions of serious forest pests, and rapid and effective eradication response to incursions.

23. What would be required to ensure data collection and analysis meets the needs of a future national biosecurity system? Who are the key data and expert knowledge holders in the national biosecurity system?

24. How can existing or new data sets be better used? How might data be collected from a wider range of sources than government?

Note that the forest industry collects a large amount of data on pest and disease surveillance which could be utilised to declare pest area freedom. This is currently not used by government.