National Farmers' FEDERATION

8 July 2016

Intergovernmental Agreement on
Biosecurity Review Panel
Via email: igabreview@agriculture.gov.au

Re: Intergovernmental Agreement on Biosecurity Review

The NFF is the peak national body representing farmers and, more broadly, agriculture across Australia. The NFF's membership comprises all of Australia's major agricultural commodities. In addition to the NFF submission to the Intergovernmental Agreement on Biosecurity Review, individual members of the NFF may provide specific comments.

The NFF firmly believes that biosecurity is one of the highest priorities for Government services to the community and economy in our era of increasing global movements of people and goods. Both industry and the community at large expect that Australia's quarantine system will continue to protect Australia's environment and biodiversity.

NFF has had a strong commitment to Australia's quarantine and has been a strong supporter of improving Australia's biosecurity protection. As part of this role, NFF has been involved with industry communication plans within Emergency Preparedness pathways. Australia's favourable pest and disease status is a vital foundation for the farming sector – in both production and marketing terms – and must be maintained through a highly-effective and efficient science-based biosecurity and quarantine regime.

Australian agriculture is an economic, social and environmental powerhouse that benefits the entire country. The competitive advantage of our produce on the world market is that Australian food and fibre are high-quality, safe and trustworthy because Australia is free of many pests and diseases affecting agricultural productivity, as well as food safety, in other countries. Agriculture's competitive advantage thus depends on well-structured and thorough biosecurity.

Question 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?

Transparent, science-based quarantine and biosecurity measures to protect Australia's environment, biodiversity and agricultural systems need a comprehensive and national approach to achieve effective prevention, detection and control of invasive species. The IGAB has the right principles, goals and objectives to sustain Australia's strong and reliable biosecurity system. It is critical that we encourage the identification and reporting of biosecurity risks instead of nudging people to hide suspected biosecurity problems from authorities.

The consolidated priority areas fail to adequately address several issues:

- The current order lists the NFF's highest priority, namely that biosecurity should be everyone's concern, at the very bottom under "Communications and Engagement". Improved awareness of biosecurity by stakeholders and the general community is vital to ensure high biosecurity compliance in our globalised world with increased travel and trade.

- Two biosecurity risk areas that don't feature prominently in the national system are the speed and volume of accelerated globalised travel and direct internet online retailing of high risk material by individuals.

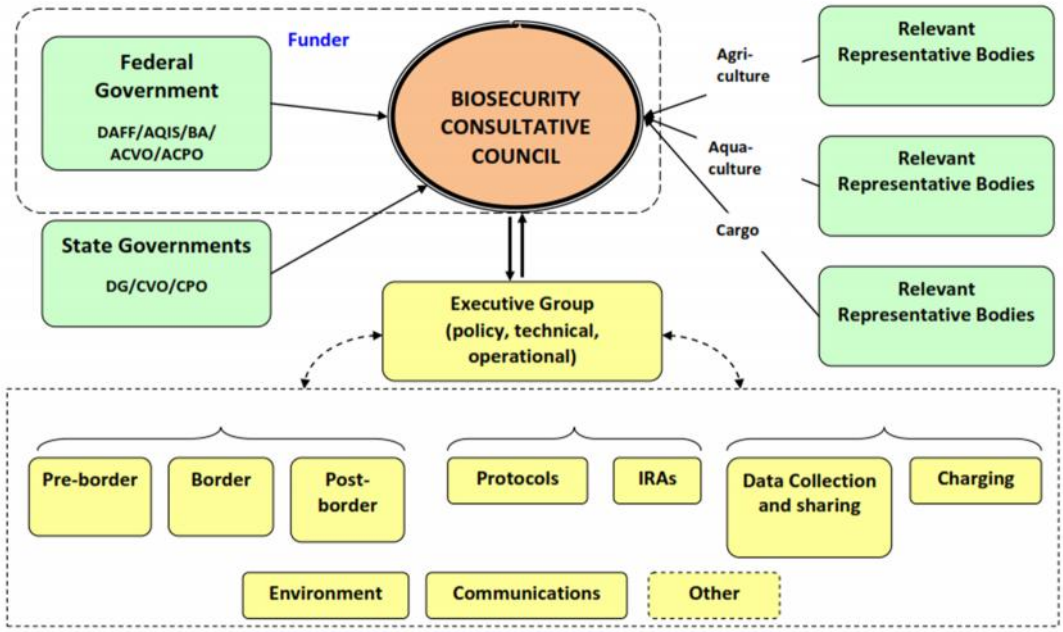
- Agroterrorism preparedness is missing: Agroterrorism is a subset of bioterrorism, referring to the deliberate introduction of an animal or plant disease with the goal of generating fear, economic losses in agriculture and food industries, and/ or undermining stability[1]. A preparedness plan could help inform stakeholders how to prevent an agroterrorism emergency/ how to act when an incursion occurs.

Question 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?

IGAB was created in response to the Beale Review in 2008 to strengthen the working partnerships between governments and to improve the national biosecurity system. According to IGAB (Article 6), a strong working partnership between governments and industry is key to a functioning biosecurity system. However, the current IGAB arrangement does not include industry in its core body, the National Biosecurity Committee, which manages the national strategic approach to biosecurity threats.

There needs to be a constant feed-back mechanism and close consultative arrangements between industry and government to minimise biosecurity risks. In a submission to the Beale Review of Biosecurity, the NFF presented an argument for the creation and resourcing of a central co-ordinating body, the Biosecurity Consultative Council (BCC), as a forum for high-level policy discussions between industry and the different tiers of government. The proposed structure includes federal and state government agencies as well as relevant representative industry bodies:

[1] An example is the US report *Agroterrorism: Threats and Preparedness* http://fas.org/irp/crs/RL32521.pdf



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

It is critical that the national biosecurity system provides a clear pathway to industry which outlines how industry and government work together when biosecurity incidents occur. There is a need for improved networks between government agencies and peak industry bodies such as the NFF. A true partnership approach to develop national biosecurity systems is crucial to improve communication, ensuring that all stakeholders easily understand differences in biosecurity legislation between states and territories.

Question 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?

Currently, industry is only engaged in an advisory function. There needs to be a national 'true partnership' forum between industry and government on the biosecurity system, providing industry with the opportunity to assist in shaping and designing biosecurity measures. Only within a 'true partnership' forum can a new biosecurity levy be discussed.

Question 16: Are market access considerations given appropriate weight in Australia's national biosecurity system? What other considerations also need to be taken into account?

There needs to be a balance between reducing the likelihood of exotic pests and diseases entering Australia and our openness towards trade, as reflected in the current wording of the IGAB (Chapter 3). Nonetheless, industry could be engaged more on priorities to better align the department's import analysis and export market access work. While the NFF recognise that exporting goods is made more difficult when Australia is slow to

action a risk assessment of another country's imports, it is crucial that Australia's biosecurity is not compromised.

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

Active treatment phases of new biosecurity incursions require ready access to emergency responses, approved treatments, appropriate chemical permits, alternative options for pesticide-resistant biosecurity matter, innovative alternative treatments for organic farming systems, and preventative breeding programs. Similar to natural disaster preparedness, there need to be agreed rapid response flowcharts to address all potential national biosecurity risks that fall outside existing Emergency Response Agreements.

Low cost, smart, innovative and automated devices for surveillance and real-time monitoring of multiple pests have the potential to better manage biosecurity. These innovative diagnostic tools can expedite early detection on farms and on niche markets such as peri-urban farmer markets. This is critical because the disconnect between urban communities and primary production increases when urban understanding of biosecurity issues and impacts decreases.

It is crucial that farmers across the country have reliable and constant access to internet services in order to digitally monitor their crops and animals. Transfer of data and access to databases is key to efficient, effective and sustainable biosecurity management in the 21st century.

Currently, electronic livestock monitoring systems, such as the National Livestock Identification system used for cattle, are often beyond reach for farmers because rural and remote Australia has unreliable internet access. Consequently, farmers rely on paper records, hampering a fast and concerted response to biosecurity incursions. Innovative tracking technologies and digital monitoring of biosecurity threats are only effective when the devices operate within a functioning telecommunication space.

Question 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?

We know that prevention, early detection, rapid response and working together is required to protect Australia's 'clean, green' image. Major biosecurity incidents affect not only the environment and primary producers, they have the potential to affect all of Australia (including, for example, the tourism sector, emergency services, the police), and thus require a whole of government approach. Good biosecurity needs to be outcome-focussed, not process-focussed.

A good national biosecurity system needs to be the responsibility of everyone in Australia. This requires a change in culture and a change in the current biosecurity approach. We need to shift the way we talk about biosecurity and the way we treat threats and outbreaks. Incursions are a reality in the age of globalisation; the question is not if biosecurity breaches will occur, but when. We need to make sure that reporting on biosecurity threats and incursions is non-punitive, easy and risk-free for the reporter in order to enable Australia's national biosecurity system to better respond to incursions.

Measures of success for a healthy biosecurity system need to consider improved awareness and understanding of biosecurity risks among the general public. To ensure

this is happening, there needs to be effective measurement of community understanding on biosecurity, captured on a regular basis. In addition to community awareness, there needs to be a strategic network of skilled biosecurity officers with search and detection expertise, looking out for new biosecurity incursions. There is an overall decline in departmental biosecurity experts and very few new positions are being mentored through universities or government networks.

For further information on this submission, contact:

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