IGAB REVIEW

General Comment

Voice of Horticulture welcomes the opportunity to provide feedback to the IGAB review and notes that since the inception of IGAB at the beginning of 2012 much has changed in the national biosecurity landscape. New primary biosecurity legislation has been enacted at the federal level, and in several jurisdictions. At the same time there has been a reduction of biosecurity resources at the state/territory level.

Whilst this submission will, where appropriate, address the specific questions posed by the Review Committee it also concentrates on the system and the areas requiring improvement. However, Voice of Horticulture acknowledges there is also much that is good and working within Australia's biosecurity system. This submission will consider both the Review and also underlying assumptions behind some of the questions.

The IGAB Review appears to have two functions, a consideration of Australia's biosecurity system and the role of IGAB within this 'matrix'.

National Biosecurity

A National Biosecurity System should exist under a framework in which the following core elements can be addressed:

- Development
- Implementation
- Responsibility
- Maintenance and Review.

These elements should cover off on a national co-ordination of the following activities:

- Incursion management
- Education
- Preparedness and risk management
- Monitoring and surveillance – including area freedom issues
- Pathogen management
- Research, development and extension (R D & E)
- Quarantine
- Policy
- Capability maintenance, development and monitoring (includes capacity)
- Funding
- Legacy (corporate memory).

Preamble

The Current System

It is the view of Voice of Horticulture that whilst Australia has a Biosecurity 'System(s)' it does not have a unifying framework under which the above operates. It is stated in the discussion paper that *'underpinning Australia's national Biosecurity System is the Intergovernmental Agreement on Biosecurity (the IGAB)'*. In reality, the IGAB appears to address just one aspect of the biosecurity framework – how governments (except Tasmania) will work together to strengthen the current system. It is difficult to accept the premise of 'underpinning' since the IGAB was developed within the province of government/s and territories, thus basing the agreement around resources and knowledge available to government.

In addition, it is perhaps symptomatic of the current fragmented nature of Australia's biosecurity system that there are already a number of national biosecurity strategies including:

- National Plant Biosecurity Strategy (and Implementation Committee)
- National Plant Biosecurity R & D Strategy
- National Plant Biosecurity Surveillance Strategy
- National Plant Biosecurity Diagnostic Strategy
- A CRC on Plant Biosecurity
- A National Bee Pest Surveillance Strategy
- National Fruit Fly Steering Committee.

In all of these areas Plant Health Australia (PHA), industry and various government agencies have an involvement, but the extent varies and the question remains as to the degree these national strategies are being driven and how much 'buy in' is there from stakeholders. The degree to which these strategies and others operate and achieve their aims is extremely variable and appears to rely as much on individuals rather than a supportive system. Indeed, at the moment collaboration and progression of activities is often the result of motivated individuals engaging in the space and determining biosecurity priorities. This emphasises the need to develop a framework for creating legacy arrangements, which do not rely on individuals driving initiatives forwards.

Within the current system some key areas are also not well catered for:

- R D & E coordination
- Integrating R & D with on-ground activity as well as R & D formulation
- Policy input
- Overall funding model
- Current deficiencies in current biosecurity management system
- Co-ordinated program for pathogen management when eradication not an option (no formal system)
- Strategic planning
- Surveillance.

The consequence is that various components of the system often operate as 'silos' and thus the concept of a 'biosecurity continuum' exists in a somewhat fragmentary fashion and is certainly not integrated within a national system.

The same can also be said about the concept of 'shared responsibility'. This term whilst used extensively has never been properly articulated or achieved a common meaning amongst members of

the biosecurity community. As a consequence it means many things to many people and no-one has any responsibility.

Lastly, and most importantly, we have no overall funding model for a national framework/and system. Individual components maybe funded but how the system should operate and be paid for has not been addressed. Under the current framework, initiatives are funded piecemeal and under ephemeral funding models. These initiatives run the risk of falling by the wayside when the focus turns to other aspects (other 'hot topics') of biosecurity. Logically, agreement on operation and funding cannot occur until there is some agreement amongst parties as to what a national framework should be and also what is meant by the concepts of 'shared responsibility' and a 'biosecurity continuum'.

Voice of Horticulture submits that what is required now is an integrated National Biosecurity Framework in which 'shared responsibility' and 'biosecurity continuum' have an agreed meaning.

To this end, Voice of Horticulture is developing a discussion paper and proposal for developing a National Framework that includes all those involved in biosecurity. It will also consider funding options.

IGAB

According to the COAG website:

"The Intergovernmental Agreement on Biosecurity (IGAB), which came into effect in January 2012, is an agreement between the Commonwealth, State and Territory governments, with the exception of Tasmania. This Agreement was developed to improve the national biosecurity system by identifying the roles and responsibilities of governments and outlines the priority areas for collaboration to minimise the impact of pests and disease on Australia's economy, environment and the community."

Accordingly industry has had minimal input into both the framing of IGAB and its subsequent 'implementation'. As it is an intergovernmental agreement it is somewhat intriguing that after five years industry is being asked for its view.

The discussion paper includes a flow chart (page 15), which outlines the arrangements supporting IGAB. This flow chart is striking in its complete omission of industry. Voice of Horticulture finds this concerning and would ask if the arrangement outlined on page 15 reflects the understanding of government biosecurity personnel on how the IGAB, and all initiatives arising from IGAB, should be approached and actioned. It also begs the question as to how, why or what is industry supposed to contribute in such an environment?

On this point, it is acknowledged in the discussion paper that: *'improved collaboration between governments, industry and the broader community will help minimise duplication and further strengthen the national biosecurity system…'* Voice of Horticulture agrees with this point and would emphasise that improved collaboration would be addressed in part by changing the current make-up of the National Biosecurity Committee (NBC) to include industry representation.

It is also notable that the discussion paper states *'The 2012 IGAB was ambitious in what it set out to achieve, not necessarily matched by the available resources'*. However, we would ask how all available resources could be mobilised during development of IGAB when industry was not included on the process?

In order for industry and government to work together effectively in the biosecurity space it is imperative that each party understands the roles, responsibilities, resources and expertise of the other. There are several priority areas, as outlined in the discussion paper on page 16, where there may be strong collaboration, including: National decision making and investment, established pests

and diseases of national significance, and communications and engagement. To this end, it is imperative that government and industry work together to define realistic responsibilities.

- Government and / or industry need to review industry capabilities. Industry has potential to provide in-kind support instead of (or in addition to) funding.
- Government must have a realistic understanding of what industry can achieve. Industry should not just be viewed as a funding source – there would be many other beneficiaries to continuation/ramping up of biosecurity activities (tourism, supply chain, consumers, restaurants etc.)
- Government are the legislators, and have access to specialist facilities and expertise – industry can only achieve so much without the support of government.

Review Question Responses

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?

This is a curious question as it is our belief that the question is apportioning far more to IGAB than we have been lead to believe. Both during its initial launch and also according to information on the Department and COAG websites the message has never been that this agreement was seen as an underpinning of the nation's biosecurity system.

It is certainly an important component but within the concept of 'shared responsibility' it can hardly be classed as 'underpinning' given that a significant part of the Australian biosecurity landscape (Industry) plays no part in it. This is clearly illustrated in Figure 2 of the discussion paper where one can see no direct role or input from industry in the system. The discussion paper notes on page 13 that Government Industry partnerships such as PHA and AHA facilitate a National approach to Biosecurity. The inference being that PHA represents industry.

This comments warrants clarification:
PHA and presumably AHA are not industry any more than they are government!

It is regrettable that this myth continues to be propagated by the Commonwealth. PHA is a body in which government and industry have dialogue and it has responsibility for the Plant Health Deed and other national activities. It is also involved in many other biosecurity related activities, but it is not an industry body. In fact given that the biggest individual contributor to PHA is the Commonwealth one could consider it more appropriate to argue that it is a Commonwealth body.

In considering the priority areas it is our view that whilst these are still relevant, little has changed from an industry perspective since 2012. In many cases we have seen a diminution of capacity as jurisdictions have reduced commitments and funding to biosecurity. Similarly the resources at the Commonwealth level have not kept pace with the increase in risk as trade and passenger movements increase.

In terms of communications and engagement the operating model is still very much working on the traditional paradigm of government making policy and decisions and then providing information to industry in the guise of consultation. It is Voice of Horticulture's view that this is notification. Even when funding is on the table the Commonwealth has proved extremely reluctant and reticent to engage in serious discussion, let alone share responsibility for its management. The history of the

Torres Strait Fruit Fly surveillance program provides no better testament to the protracted process involved.

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

Apart from a presentation at the launch of IGAB in Dec 2011 and a couple of minor information sessions at PHA meetings there has been very little engagement with industry. An examination of the relevant webpages on the DAWR website shows that in some cases the information is old or that very little has happened. This makes the statement that IGAB underpins the Australian biosecurity system even more unrealistic.

To our knowledge, industry has not ever been asked to participate in IGAB Working Groups nor has it had any mechanism by which it can contribute. At the launch of IGAB to industry (Canberra Dec 5, 2011) the strong view from the industry participants was that there needed to be a proper mechanism for formal engagement. This has not happened. It is thus our view that the IGAB process is neither transparent nor inclusive.

Perhaps the best testament and irony is the document on Engagement and Communications:

http://www.agriculture.gov.au/SiteCollectionDocuments/animal-plant/pihc/bepwg/national-engagement-communication-framework.pdf

The irony of producing a document of this nature without the involvement of the industry component of the biosecurity spectrum seems to have been lost. Furthermore, it does not consider the changing face of engagement when funding for activity(ies) is coming from non-government sources. It is perhaps a reflection of the confusion that exists around the terms of 'shared responsibility' that such a document can be produced.

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?

As noted above there needs to be a formal framework constructed with the input of all parties that provides the ability for industry to be actively part of NBC through their respective industry forums in PHA and AHA.

Agreeing to risks, priorities and objectives

1. Is the goal, and are the objectives, of Australia's national biosecurity system still appropriate to address current and future biosecurity challenges?

2. 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?

3. 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?

4. 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?

5. 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 five questions listed above have been touched upon in responses already described in this paper and will be considered as a block in the following paragraph.

As discussed elsewhere it is our belief that Australia needs a national approach and framework to biosecurity that is somewhat different to the rather siloed and ad-hoc approach that exists at present. For this to occur there needs to be a genuine desire by governments(s) to recognise and involve industry across the biosecurity spectrum.

This needs to occur at NBC level and below. The benefit of such an approach is that there will be a more unified approach to biosecurity and the opportunity to develop true partnerships. The nation cannot have the dualistic approach of wanting a national system with all stakeholder(s) involved in biosecurity but only when it suits government.

A key issue in this area is capacity. To be involved in biosecurity requires resources, and government needs to facilitate the process for industry to build capacity so that it can contribute in a meaningful way. Clearly this will involve funding and funding mechanisms. This needs to be an important part of any future national approach. Clearly as capacity is increased the diversity of opinion will increase and as part of any 'shared responsibility' there needs to be recognition by governments that this will involve compromise and also a greater say in resource allocation.

It is the view of this submission that until a true national framework is agreed then there will continue to be disagreement on the composition and intent of Australia's biosecurity system.

Embedding shared responsibility

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

2. 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?

These two questions have largely been addressed above.

Nonetheless, it should be recognised that within many industries (especially smaller ones) there is a lack of knowledge in regards to the role of government in managing border biosecurity, during an incursion, and during management of endemic pests. On the part of government, both state/territory and the Commonwealth, there is an assumption that industry is well placed to take the leading role and has resources and knowledge to initiate management, surveillance and preparedness schemes. How this should be funded or managed, with limited or no capacity, appears to have not been given any serious thought. It is important to remember that government are the legislators, and have access to specialist facilities and expertise, while industry has access to knowledge and resources that should be further explored.

It is pointed out in the discussion paper that 'In some cases, *'shared responsibility' has been viewed as a vehicle to 'cost-shift' activities to other stakeholders in the system.'* Voice of Horticulture views this as a true observation. It is a mindset that stands in the way of further collaboration.

On the point of shared responsibility, several government jurisdictions have opened the conversation with industry regarding contribution of funds towards maintenance of state run biosecurity activities.

During these discussions industry has emphasised that other sectors, such as hospitality, tourism, and the supply chain, will benefit from contribution of funds. There are also non-commercial beneficiaries to consider, such as urban gardeners. This raises the question, how much of a role should these beneficiaries play in the new paradigm of shared responsibility?

Another category of risk to farm biosecurity are service providers (eg Power companies), but also transient farm workers, tourists and media. Voice of Horticulture would ask how will a new biosecurity framework will address increased risks imposed by visitors to production areas?

Funding biosecurity

1. Are the IGAB investment principles still workable? Do they still meet the needs of Australia's national biosecurity system now and in the future?

2. 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.

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

4. 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?

5. 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?

A number of these questions have already been addressed elsewhere. The need for an appropriate funding model is paramount both for R D & E and also for the general system as a whole. If biosecurity is a national priority then perhaps it needs to be considered in a similar vein to funding other national schemes eg., Medicare levy, or Emergency Levies. Similarly R D&E could be funded through RDCs being required to contribute a fixed percentage into the R D & E component of a national Strategy that would be overseen by an investment committee as part of a National Biosecurity framework and strategy.

The degradation of biosecurity and loss of science and diagnostic capacity in Government has already been highlighted and here again this is in direct contrast to Australia's increasing trade and passenger traffic. Secondly as more of Australia's north is developed for agriculture and horticulture in particular, there will be increasing pressure from incursions of northern origin. This will arise due to the establishment of islands of suitable habitat in the otherwise less suitable savannah and monsoonal woodlands. This factor does not appear to be adequately addressed at a strategic level.

Governments also need to recognise that where biosecurity risks are created within Australia there needs to be a mechanism to reduce such risks where the risk creators are no longer in a position to pay. An example here is abandoned orchards. This can occur when the landowner is forced to abandon the property due to economic circumstances but the trees remain and act as suitable pathogen and pest reservoirs. The Goulburn Valley in Victoria is a case in point.

The notion of risk creators warrants exploration as they do not contribute directly to the biosecurity system. There are many categories of risk creator, in fact anyone or thing that travels. Significantly

within the agricultural supply chain it is only local producers who directly fund incursion responses. Some consideration needs to be given as to how or whether other significant risk creators should be brought into the biosecurity system.

Local councils are also not involved in biosecurity to any great extent and again their maintenance of reserves, and other land often provides a reservoir of weeds and other biosecurity risks.

Market access

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

2. 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?

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

Here again we believe we have addressed this issue through our earlier points. It is noted that Nursery and Garden Industry Australia (NGIA) have invested heavily in a Biosecure HACCP system in order to address question 2 and 3 above. AUSVEG is currently looking at a similar system for its members. The point has been made that at PHC level we still do not have agreement on a National framework/system for surveillance. Again this point was raised and acknowledged by the Commonwealth, at the December 2011 meeting in Canberra and little has changed. There are many industry programs both formal and informal (eg. Seed Potato Certification), Plant Health Certificates, and informal (crop scouting) whereby surveillance is employed.

Unfortunately, we still do not have a system whereby this information is captured and used for the purpose of informing biosecurity and area freedom. PHA has also invested significantly in this area, through development of the Virtual Coordination Centre, but again due to the way the system operates it appears that a plethora of other systems are also being considered. This is wasteful and again reflects the fragmented approach to a national system. There is still an opportunity to address this issue and here IGAB should be playing a key role. Again, we would point out the need to develop a framework that supports a legacy system, which will continue into the future regardless of what individuals are taking a leading role.

The role of research and innovation

1. 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.

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

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

The need for a national approach to managing R D & E has been well articulated in the discussion paper prepared for the PBCRC. The point has received universal agreement amongst respondents to

this paper that this is required and little further needs to be added, except on the point of capturing international research and strengthening international relationships in the biosecurity space: Efforts should be made to conduct an analysis of past and current plant biosecurity R&D in order to leverage off past levy funded research, as well as R & D carried out overseas. It is clear that important research has been conducted and forgotten. Voice of Horticulture also has concerns that the current funding model and operation of R D & E is not delivering benefits commensurate with the investment.

Voice of Horticulture would emphasise that industry is universal in its agreement that in the plant area a new RDC or something of that ilk is not required. This will be addressed in the Voice of Horticulture discussion paper mentioned earlier. However, it is our view that R D&E should be a component of an integrated National Biosecurity Framework.

Measuring the performance of the national biosecurity system

1. 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?

2. 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?

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

We are unaware of any formal process for measuring Australia's success or otherwise in operating its biosecurity system. However until agreement is reached about what a national system should look like, how it would function and methods of delivery then it is difficult to construct KPIs around measuring the success or otherwise. As highlighted many times in this response, success can mean many things to many people whenever they have different expectations. Once success is formally defined there needs to be a formal and **independent** audit process against the KPIs and this needs to have outcomes as any other audit. Unfortunately the new legislation does not provide for this process.

The Voice of Horticulture is a member-based organisation representing horticultural growers and businesses across fruit, nuts, vegetables, mushrooms, turf, nursery plants and cut flowers. The Voice of Horticulture represents 35 different peak industry bodies from around Australia, accounting for the vast majority of the industry's $10 billion farm gate value and 20,000 plus businesses.

Voice of Horticulture appreciates the opportunity to provide comment on the IGAB Review.