



To Whom It May Concern,

Our Ref: 05-010-01-001

Thank you for the opportunity to comment on the Intergovernmental Agreement on Biosecurity Review.

Due to the timeframe of the consultation period, the comments contained in this letter have not been considered or endorsed by WALGA's State Council. Please be advised that this is an interim submission, and that the WALGA reserves the right to modify or withdraw the comments as directed by State Council.

The Western Australian Local Government Association (WALGA) is the united voice of Local Government in Western Australia. The Association is an independent, membership-based group representing and supporting the work and interests of 138 Local Governments in Western Australia.

The Association provides an essential voice for over 1,200 elected members and approximately 14,500 Local Government employees as well as over 2 million constituents of Local Governments in Western Australia. The Association also provides professional advice and offers services that provide financial benefits to the Local Governments and the communities they serve.

Comments on the Intergovernmental Agreement on Biosecurity

The Association supports the clear identification, negotiation, allocation and communication of roles and responsibilities for Government (Federal, State and Local), industry and the community in the area of biosecurity and commends the Panel on their comprehensive engagement on this issue. The Association is currently finalising its revised policy position on biosecurity, and looks forward to further discussion and engagement in the process.

Local Government has an important role in biosecurity as a community representative, service provider and as a regulator. Local Government's roles in the area of biosecurity include:

- Management of pest species on Local Government owned land under the *Biosecurity and Agricultural Management (BAM) Act 2013*;
- On-going support for local community groups in the area of natural resource management, including the management of post-border invasive species;
- Developing and enforcing pest management local laws under the *Local Government Act (1995)*;
- Providing tools, management plans and staff support/training on post-border biosecurity issues;
- Delivering environmental education programs and other information relating to biosecurity to the community;
- Regional collaboration between Local Governments to deal with regional biosecurity issues;
- Providing field trial sites for biological control of certain weeds, e.g. Bridal Creeper; and
- Emergency management - Local Governments through their emergency management planning processes can identify and plan for a range of risks, including biosecurity. In this area Local Government has an on ground function and can draw on local knowledge and expertise.

The roles that Local Government performs in the area of biosecurity have to be managed within the resourcing constraints of each Local Government. These constraints include financial, staffing and technical capacity.

Local Government is playing a key role in biosecurity that needs to be recognised and resourced. Local Government, and the communities that it represents, ultimately bear the consequence of any biosecurity issues. The State and Federal Government, while regulating and resourcing these areas, do not feel the direct, physical or economic consequences of biosecurity issues. State and Federal Government need to understand the implications of their decisions on Local Government and give Local Governments input into decisions adequate consideration and weight.

Local Government is not represented at the national Ministerial table when these discussions are occurring.

Previously, when the matters were discussed at the Ministerial Council level, Local Government would have been involved through the Australian Local Government Association (ALGA). However, with the dissolution of the Ministerial Council, Local Government is no longer represented. For other areas where Ministerial Councils were removed, Local Government still has a representative. For example, the Standing Council on Environment and Water was removed, however a Meeting of Environment Ministers now occurs and a Local Government Representative is in attendance. The Association recommends that Local Government, through ALGA should again have a representative during these biosecurity discussions.

It is worth noting that in Western Australia, Local Government has a position on the State Biosecurity Council, which provides independent advice to the state Minister for Agriculture and Food.

The use of State (or Federal) administered industry levies to address biosecurity issues can be problematic. In Western Australia, Local Government experience of State Government Levies – e.g. the Emergency Services Levy and the Landfill Levy, respectively – is that although the funds from these sources may initially be hypothecated to a specific use, when the State is looking to reduce expenditure these levies end up funding core government functions and/or the percentage of hypothecation is reduced.

Specific responses are as follows, however note that not all questions are within the preview of the Association to answer:

Question 1: Is the IGAB a suitable mechanism to underpin Australia's national biosecurity system in the future? Are the consolidated priority areas still appropriate?

Response: The Association considers that the IGAB has value as the overarching mechanism, however consideration should be given to the inclusion of a discrete seventh priority area: monitoring and reporting.

Question 2: What are your views on the construct, effectiveness, and transparency of the IGAB?

Response: The Association considers that – in keeping with the systems underlying concept of 'shared responsibility' - a review of the governance and representation model needs to be undertaken to ensure adequate representation of peak industry groups and Local Government (through the Australian Local Government Association).

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?

Response: The Agreement needs to recognise the limitations of a 'cut and run' policy approach being adopted by at least one jurisdiction (Western Australia). With regard to the broader community, there needs to be processes in place (e.g. co-funding models, capacity building and knowledge transfer) via state governments, to ensure that the broader community can be properly supported in determining and undertaking of whatever aspects of shared biosecurity responsibility it deems necessary.

Question 4: Is the goal, and are the objectives, of Australia's national biosecurity system still appropriate to address current and future biosecurity challenges?

Response: The Association queries the caveat of the third objective "*(where appropriate)*" and questions as to who makes the determination of "appropriateness". For example in Western Australia, DAFWA seek to maintain the role in determining levels of state government support (under *the Biosecurity and Agricultural Management Act (2007)*) and what species are declared under the BAM Act. It is also seeking to set up community based Recognised Biosecurity Groups that seek to deal with specific established invasive species. It is the Association's view that there needs to be a mechanism that empowers these 'front-line' community based Recognised Biosecurity Groups with the necessary tools (including state regulatory support) to manage problematic invasive species and importantly, that provides the mechanisms for monitoring and reporting, so as to ensure consistent reporting of the spatial and temporal distribution of established invasive species, and of the management effort being undertaken.

Question 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 risks and priorities?

Response: The Association suggests that the existing objectives are adequate, however is concerned that one key objective should be in relation to integrated knowledge management.

It is not clear to the Association how the existing objectives can fully support the goal of the national biosecurity system without an objective of having a transparent, accessible and integrated knowledge management framework accessible to (and for) key stakeholders and front line managers.

Indeed, it is not clear as to how any of the objectives (or underlying strategies) can be measured without one. With increasing expectations upon industry and community, it needs to be recognised that these actors are increasingly the eyes and ears, as well as the managers of (particularly) post border invasive species. It is therefore critical that there is a consistent and agreed suite of adaptive tools and mechanisms to facilitate the understanding of the spatial and temporal distribution of established invasive species, amongst all stakeholders. This is an important consideration in ensuring both the adequacy and the legitimacy of future policy and program designs and investment decisions.

Question 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?

Response: No. It is suggested that most of the non-producer beneficiaries (i.e. the general community) are generally unaware, outside of the quarantine efforts that are highlighted throughout domestic and international airports.

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

Response: No. The situation in Western Australia is still evolving in terms of the structural reform and, importantly, the consultation required to be undertaken by the state government through DAFWA. More broadly, the discussion paper seems to talk more in terms of stakeholders, rather than beneficiaries? There are clearly both public and private economic beneficiaries (as well as social and environmental benefits) from a strong biosecurity framework, and these need to be both recognised and addressed in the narrative around 'shared responsibility'.

Question 10: What practical actions do you think government and industry organisations can undertake to strengthen the involvement of industry and community and industry stakeholders in Australia's national biosecurity system? Would increased involvement in decision making on and implementation of biosecurity activities help with the adoption of shared responsibility?

Response: Given the lack of understanding of the challenges of biosecurity by the general public, (e.g. the potential threats to international markets, impacts on public amenity and the environment, etc.) the value proposition of shared responsibility is largely falling on deaf ears. In Western Australia, it can be argued that community groups are forming to deal with specific invasive species because of a significant and continual reduction in funding by a succession of state governments in relation to biosecurity (and natural resource management in general). State government structures (or a lack there of) have dissolved the focus from on-ground community stakeholder support, instead forcing Departments to focus more on meeting state government efficiency dividend requirements (for example). The Association contends that the IGAB needs to be within the context of a bilateral agreement that, in relation to community, drives and leverages State and Commonwealth joint investment to support post border invasive species management at the regional/local level.

The Association highlights the relative success of this approach in relation to previous joint initiatives such as under the Howard Government Natural Heritage Trust model. Underpinned by a bilateral agreement, and with a multi-stakeholder State Investment Committees at the jurisdictional level, funding and programs were delivered through the community led and (generally) catchment based natural resource management groups, which are still in existence and functioning across Australia today.

This model actively engaged all key stakeholders in the decision making, provided state and commonwealth public servants with a practical understanding of issues through access to local and regional expertise, and leveraged funding for maximum on-ground outcomes.

While successive national governments have since modified the approach (the bilaterals are gone, as is much of governance structure that underpinned it), the regional NRM management framework (now under the banner of the National Landcare Program) still functions.

The Committee is urged to consider utilising this existing national NRM model that could be harnessed in terms of its focus on natural resource management (including biosecurity) and leverage its existing focus on community education and engagement, governance, investment, and on-ground implementation, monitoring and reporting.

Thank you again for the opportunity to comment on the Intergovernmental Agreement on the Biosecurity Review. The Association considers that this review provides an important opportunity for the role and challenges facing Local Government in addressing post-border biosecurity to be recognised.

Yours sincerely,



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