

Plant Health Australia's submission on the

# Intergovernmental Agreement on Biosecurity Review Report

2017



Plant Health  
AUSTRALIA



Improving national biosecurity  
outcomes through partnerships

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## Submission on the **IGAB Review draft report**

Plant Health Australia (PHA) welcomes the opportunity to respond to the draft report on the review of the Intergovernmental Agreement on Biosecurity (IGAB).

As the report acknowledges, Australia's biosecurity system works in a dynamic environment where challenges are increasing. Given the fundamental importance of biosecurity to all Australians, it is important that IGAB, one of the key frameworks of the biosecurity system, is reviewed and if necessary, reformed.

The draft report outlines areas where reforms are needed, including improved funding of the system, increased capacity, better use of new technologies that can bring great benefits, improved awareness of the importance of biosecurity, tighter coordination of biosecurity science, cross-sectoral gaps that need to be addressed by national arrangements, and better engagement of local governments.

PHA staff have given the submission much consideration and provide comments in the following format:

- General comments on the review report.
- Comments on the requested feedback areas.
- Comments on specific recommendations where appropriate.
- Corrections that need to be made.

## **General comments on the report**

### **Recommend core funding of the system at the First Ministers' level**

Biosecurity incursions and outbreaks threaten the Australian way of life. New pests and diseases can devastate our unique ecosystems, reduce social amenity, undermine agricultural production, reduce the sustainability of rural communities, increase the need for chemical use, reduce overseas markets for our produce and significantly damage the economy.

The adage that prevention is better than cure is completely correct. The costs of eradication responses are enormous, and the alternative, living with the new pest is also expensive. Plant pests are often not eradicable, so the impacts of a new pest including loss of market access, damage to the environment, diminishing returns from agricultural production and potentially devastating effects on regions, are long lasting if not permanent.

As such, a good biosecurity system is as important as other fundamental services such as effective health care, the judicial system, education and transport, and PHA believes that the way that biosecurity is funded should reflect this importance.

PHA considers that this review is the ideal opportunity to recommend a First Ministers'-level funding agreement to provide ongoing surety for biosecurity.



In addition to ensuring adequate funding by all jurisdictions on an on-going basis, such an initiative would also signify the importance of biosecurity for Australia, and encourage greater public awareness of the need for all Australians to play their part.

## Include more on the valuable roles that other stakeholders play in the Australian biosecurity system

The review's terms of reference were, in fact, broader than a review of the effectiveness of IGAB. As a result, PHA believes that the panel's report needs to feature more about the important contributions made by stakeholders other than government. This includes the significant inputs by industry, community, PHA and Animal Health Australia (AHA). The benefits of partnerships, including the legally-binding emergency response agreements between industry and government (Emergency Plant Pest Response Deed (EPPRD) and the Emergency Animal Response Agreement (EADRA)) should also receive more focus. These additions would make the report more representative of the system as a whole.

The panel needs to consider if Australia needs a new IGAB or whether it needs a broader framework that involves all Australians—an Australian Agreement on Biosecurity. Given that a general biosecurity obligation (which mandates roles for all Australians in risk mitigation for biosecurity) is now in legislation in Queensland and NSW, and indications are that it will be progressively introduced in other states and territories, the latter approach might be more appropriate.

Given that biosecurity activities of industry, community and government are becoming increasingly entwined, it might make more sense to make an agreement that encapsulates all activities rather than only focusing on government activities.

While this is the panel's decision, PHA also thinks that the report should make the efforts of industry more apparent, since industries are progressively increasing contributions to the system, often using levy mechanisms. There are changes required to Table 2 and Figure 2 to more accurately reflect the contributions of other stakeholders, which we have detailed at the end of this report.

## Include more on the major role that PHA and AHA play in successfully facilitating partnerships

Governments alone cannot and should not be responsible for biosecurity. The Beale Review established the need for shared responsibility and today this is embodied in the emergency agreements, the structure of PHA and AHA, and in the many partnerships that these companies have formed between multiple stakeholders that strengthen the system.

The report notes the difficulties of defining and quantifying the term "shared responsibility". PHA operationalises shared responsibility in partnerships—that is, contractually agreed arrangements with specific partners, activities and outcomes—and recommends that the panel does the same in its report.

Partnerships play a key role in Australia's biosecurity system, and these are often formed through PHA and AHA. We are highly successful at founding effective partnerships between government, industry and community and this should be acknowledged in the report and in the panel's recommendations.

After many years in operation, the unique government and industry structure of the companies has clearly demonstrated benefits that should be celebrated. The report should recommend that partnerships and the roles played by PHA and AHA are supported and extended, further strengthening the system. Further, it would be beneficial to all that the organisations are made members of NBC, further embedding the partnership approach.

PHA negotiates and facilitates many partnership arrangements that strengthen the plant biosecurity system. In addition to the Livestock Biosecurity Network featured in Box 1 of the report, there are other examples. The [Grains Farm Biosecurity Program](#) is an outreach program that has encouraged the uptake of farm biosecurity among grain growers nationally for the past decade. It is a highly successful partnership agreement between Grain Producers Australia, five state governments and PHA, that raises awareness of the need for on-farm and supply chain biosecurity.

Another excellent example of the benefits of government, industry and community partnerships are the various [honey bee biosecurity strategy programs](#) funded and carried out by governments, community volunteers and honeybee and crop industries.

The panel should recommend using these as models for further initiatives.

## Reduce the amount of focus on overseas trade

Given its responsibility for international market access, PHA sees that national prioritisation of pests is a sensible mechanism for allocating Australian Government funding. However we caution against establishing the same priorities for all stakeholders in the system, neglecting other damaging pests and pest pathways.

Since there are thousands of exotic pests that could make it to Australia and establish here with major impacts, it is very difficult to predict the next exotic plant pest incursion. Focussing only on a list of pests will produce an inflexible system, the opposite of what is needed. The Australian system needs generic preparedness processes and tools including broad diagnostic capacity and general surveillance, which, together with intelligence gathering, will enable a fast response, regardless of which pest makes it through border controls and becomes the next challenge.

While international market access is a focus for the Australian Government and for some industries such as grains, other stakeholders such as state and territory jurisdictions, plant industries that supply domestic markets, or those protecting the environment, rural communities and social amenity will have different concerns.

Reflecting the range of impacts that pests can have, not only on market access, PHA considers that the report should recommend maintaining a broader focus rather than narrowing it.

## Incorporate the existing plant biosecurity vision and annual status reporting

The report should incorporate more information about two PHA initiatives: the [National Plant Biosecurity Strategy](#) and annual editions of the National Plant Biosecurity Status Report.

The Strategy, endorsed by PHA members both government and industry in 2010, sets out very clearly the agreed view of how the plant biosecurity system should look by 2020. As a nationally endorsed model, the Strategy (and its underlying [surveillance](#) and [diagnostics](#) strategies) and the

subsequent [2015-2020 Implementation Plan](#) (which sets out the reforms remaining to be done by government and industry partners) should be mentioned at various points through this report.

Similarly, annual editions of the [Status Report](#) capture a great deal of system activity already and more mention should be made of the data collected and presented there when discussing stocktakes of system inputs and RD&E.

## Feedback requests

**Feedback request 1** The Review Panel seeks feedback on the draft roles and responsibilities of national biosecurity system participants.

### COMMENT:

PHA sees merit in defining the system and the roles of stakeholders, however Australia's plant biosecurity system is complex and the list included in the draft report misses many potential risk creators. Some groups that need to be included are tourists (both domestic and international), the supply chain (including importers, wholesalers and retailers), as well as land managers, home gardeners, and utility providers. While it is feasible to define the biosecurity roles of industry and government, this is not the case for other stakeholders, particularly at the individual level.

Rather than attempting to make a comprehensive listing of all participants, PHA sees merit in broadening stakeholders to include all Australians (plus visitors). In our submission to the review, we pointed out that currently many potential risk creators are not being engaged, a situation that is contrary to the general biosecurity obligation and that is very risky. We said:

*... industry bodies are only responsible for reaching producers who are members of their organisation. This means that other risk creators are not covered. For example, producers who choose not to join such as the high-risk peri-urban producers, and residents of regional towns that can ruin area wide management of endemic pests such as fruit flies, are not covered by peak industry bodies.*

*There is considerable risk associated with lack of engagement with the general public, as potential risk creators. Australians will inevitably continue to view biosecurity as just the remit of the Australian Government at the border, not realising their potential to introduce new pests or spread existing ones.*

PHA recommends that rather than trying to identify every possible risk and risk creator, the panel recommends telling Australians that everyone has a role to play in protecting Australia from pests and diseases. Government should take the lead in developing an overarching communication strategy for biosecurity that explains that we all have a responsibility to consider biosecurity in our everyday activities. The branding that is developed can then be built upon by other stakeholders such as peak industry bodies, PHA and AHA, community groups with more tailored campaigns to address particular risks.

**Feedback request 2** The Review Panel seeks feedback on the total effort and costs associated with demonstrating area freedom by jurisdictions, and the value of that trade.

**COMMENT:**

PHA is not convinced that a simple cost-benefit analysis is possible or worth the effort. The panel should consider the following factors.

Industry currently plays a key role in demonstrating area freedom, not just jurisdictions.

Trade is not the only consideration. Others include the importance of early detection for eradication responses, as well as the value of protecting the environment, social amenity, the sustainability of rural communities and domestic industries as well as the other pests that affect these aspects.

Instead, the panel should recommend an analysis of the effectiveness of surveillance and crop monitoring to identify any duplications or gaps and how efficiencies can be driven.

**Feedback request 3** The Review Panel seeks feedback on the following options for a new entity for cross-sectoral biosecurity R&I:

Option 1: Establishing a new stand-alone entity for cross-sectoral biosecurity R&I.

Option 2: Addressing cross-sectoral biosecurity R&I within an existing RDC (for example, the Rural Industries RDC).

The Panel also seeks feedback on the funding options and would welcome alternative suggestions.

**COMMENT:**

As PHA stated in our submission to the review, PHA believes that a new structure is not required to coordinate plant biosecurity RD&E and we can report that support for a new entity is lacking among our industry, government and RDC members.

Data gathered by PHA shows that the PBCRC is just one player in the complex plant biosecurity RD&E system. The National Plant Biosecurity Status Report on the 2015 year highlights over 570 active RD&E projects, and shows that around 15 per cent are funded by the PBCRC. We have since discovered that some RD&E commissioned by the Department of Agriculture and Water Resources was missed in the audit, which lowers the estimate further.

While the CRC is funding many worthwhile activities, these activities will not simply stop once the CRC is wound up. The CRC's largest program on stored grain pests funded by the GRDC and bulk grain handling organisations will continue, irrespective of the decision around a new body, as the work is important to the grains industry.

In addition to PHA, two thirds of respondents to the Australian Farm Institute report do not support a new structure. Those that did want a new structure were all recipients of funding from the CRC. International agencies, GRDC, Hort Innovation, ACIAR, the Crawford Fund, and the New Zealand Government through MPI and Plant and Food Research supported an alternative approach.

Furthermore, the panel should note that RD&E coordination has improved in recent years since PHA has taken on the role of strategy leader for the cross sectoral Plant Biosecurity RD&E Strategy (reporting to the AGSOC R&I committee). PHA also participates on the NBC and the Plant Health Committee (and its subcommittees) and uses these structures to discuss plant biosecurity RD&E



priorities from a regulatory perspective. In addition, PHA is working with the seven plant RDCs to develop a mechanism that allows consideration and prioritisation of plant biosecurity RD&E.

Through these three arrangements, PHA can ensure research and regulatory priorities for plant biosecurity RD&E are developed taking into consideration all viewpoints and, via the links with the seven plant RDCs, can facilitate national coordination.

Given this arrangement already exists, the creation of a new stand-alone entity would compete for limited resources and would add additional costs and complexity to the system.

**Feedback request 4** The Review Panel seeks feedback on the proposed Terms of Reference for the NBC.

**COMMENT:**

As mentioned earlier, since PHA and AHA are such a central part of the biosecurity system, the companies should be included as members of the NBC, not only sitting on working groups. As we stated in our submission to the review, we believe that partnership opportunities with industry can be further developed to benefit the system outside of IGAB, and PHA and AHA are the ideal facilitators. Also, as mentioned earlier, partnerships should be incorporated into the report's vision for the future system.

The review panel needs to decide whether the NBC is to remain a government-only committee or if it is to be a broader whole of Australia structure. If it is the former, then the Terms of Reference need to be changed to reflect this. Box 9 currently includes statements that go beyond government. One example is "ensuring an effective national biosecurity capability is maintained", which in a government-only agreement should be changed to "ensuring that governments maintain an effective national biosecurity capability".

**Feedback request 5** The Review Panel seeks feedback on the following options to ensure a more rapid response to an exotic pest or disease incursion:

Option 1: Cost-sharing arrangements should provide for four weeks of monitoring, assessment and preliminary control strategies, while an overall assessment is conducted on the possibility of successful eradication.

Option 2: Cost-sharing arrangements should include a default funding arrangement for when decisions cannot be quickly reached about the success or otherwise of an eradication program.

**COMMENT:**

PHA's comments here relate solely to experiences under the Emergency Plant Pest Response Deed (EPPRD). As identified in section 8.3.5 of the draft review report, concerns have been raised recently by signatories to the EPPRD regarding the lack of timeliness of response actions. Since it is imperative that a response is mounted quickly every time, PHA has considered ways to improve existing arrangements to fix the problem.

PHA's view is that both proposed options are unnecessary and neither will address the core issues effectively, while adding complexity.



There are provisions under the EPPRD that enable parties to implement responses quickly, so PHA favours recommendations that improve performance of the existing provisions. These include:

- Encourage full participation early in an incident – Even at the stage of a response when feasibility of eradication is not known, it is crucial that all parties engage and collaborate. The provisions of the EPPRD enable this.
- Encourage the development of briefer and shorter term response plans – Encourage the development of short and sharp response plans with defined objectives and specified time frames, rather than extensive ‘whole of life’ plans which take a long time to develop.
- Maintaining capacity and capability within jurisdictions – Staff turnover results in the loss of capacity to respond, a drain that must be avoided to speed up processes.
- Improved secretariat services – This pivotal role must be staffed with sufficient, trained personnel with the ability to boost capacity when required, and who impose strict deadlines for the completion of required processes.
- Improved training – CCEPP members should be trained in ‘emergency response’ decision making to support timely decisions.
- Improving decision making capacity and capability of the CCEPP and NMG committees – Timely decision making can be facilitated by providing guidance on how a group can make a decision even where information is incomplete. Committee members can be assisted to weigh up how important any missing information is for decisions and response activities.

PHA continues to work to improve the speed of responses. For example, it has been emphasised to signatories and clarified in the EPPRD that a phased approach to response planning is possible and supported.

Improved decision making processes and equity for initial reporters of suspect plant pests are being explored by issue resolution groups, comprised of EPPRD signatories.

Another issue with the proposed options is that a four-week period of separate arrangements would only serve to further undermine the need for jurisdictions to maintain adequate staffing – that is, ‘normal commitments’. Four weeks is very arbitrary in any case, given the huge variation in how incursions unfold.

PHA suggests that instead of the proposed options, the panel makes a recommendation that jurisdictions maintain normal commitments, as defined in [PLANTPLAN](#) and AUSVETPLAN, the operational guides to the emergency response agreements.

## Comments on recommendations

### CHAPTER 2 KNOWING AND OWNING OUR ROLES AND RESPONSIBILITIES

**Recommendation 1** The NBC and the proposed Industry and Community Advisory Committee, through an open, transparent and collaborative process, should lead the development of a draft National Statement of Intent for public consultation that outlines:

- a vision, goal and objectives for the national biosecurity system
- principles for managing biosecurity
- the meaning and application of ‘shared responsibility’
- the roles, responsibilities and commitments of participants, including accountability measures
- governance arrangements for the national biosecurity system.

The process should involve government (including local government), industry and the community.

#### COMMENT:

PHA sees merit in developing a draft National Statement of Intent for public consultation although the panel should consider the comments made under Feedback request 1 regarding the general biosecurity obligation.

The panel should also recognise and include in the report the work that has already been done by PHA and stakeholders in the plant biosecurity system, encompassed in the National Plant Biosecurity Strategy—a vision, goal and objectives for the plant biosecurity system that has been endorsed by government and industry partners.

In addition to devising and socialising a National Statement of Intent, which can be useful in policy discussions, public information campaigns are required, to raise awareness among Australians of what biosecurity means, both in general terms as well as specific behaviours that are necessary for protecting Australia. For example, telling Australians and visitors to abide by interstate import restrictions, to check for imported pests when opening parcels from overseas, or to always clean fishing and camping equipment after use.

### CHAPTER 3 MARKET ACCESS IS KEY

**Recommendation 2** The Primary Industries Technical Market Access and Trade Development Task Group, should seek to enhance engagement with industry to ensure that Australia’s market access strategies are aligned appropriately through an agreed priority setting process, and that the degree of transparency and communication is carefully weighed against its level of risk to trade activities.

**Recommendation 3** IGAB2 should strengthen consideration of market access requirements within the next NBC work program.

<b>Recommendation 4</b>	Jurisdictions' biosecurity surveillance activities should include pests and diseases that pose the greatest threat to our export markets.
<b>Recommendation 5</b>	States and territories should utilise (or adapt) the dispute resolution process agreed by ministers in 2012 and include the key elements of that in IGAB2.
<b>Recommendation 6</b>	IGAB2 should clarify the roles and responsibilities of the parties with regard to international and domestic market access, including proof of area freedom.

#### COMMENT:

While market access is an important consideration, as stated earlier, PHA sees more complexity in the issue than the report acknowledges and recommends maintaining a broader approach. A focus on market access neglects other aspects that are worth protecting such as protecting productive industries and the rural communities that they support, the environment and social amenity.

The report should also ensure that a broad focus on plant pests is recommended because it is not evident which pests might become an issue for trade in the future.

Regarding surveillance activities of jurisdictions, PHA considers that plant pest surveillance activities are on the cusp of a major change towards a methodology that harnesses the efforts of industry, growers and accredited third parties—work that has begun in earnest with the development of *AUSPestCheck*, and also through individual state and industry initiatives such as MAX, MyPestGuide and GrowNotes Alerts. As our submission to the review argued, the panel should recommend that governments pursue these opportunities to enhance the government-industry partnership for biosecurity.

Also, as per our submission, consideration needs to go to the issue of how industry bodies can be sustained with sufficient funding to perform their crucial roles in the biosecurity system.

## CHAPTER 4 STRONGER ENVIRONMENTAL BIOSECURITY

<b>Recommendation 7</b>	IGAB2 should include an explicit commitment by jurisdictions to support financially, decisions agreed to under NEBRA, but look to put in place systems that ensure decisions are evidence-based and transparent, in keeping with best risk management principles, and that give confidence to governments and the community that funds are being committed wisely and appropriately.
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#### COMMENT:

NEBRA will need support from jurisdictions but in PHA's opinion, more is needed beyond an emergency response agreement—a framework for prevention and preparedness measures such as surveillance and awareness campaigns is lacking.

<b>Recommendation 8</b>	Jurisdictions should institute formal arrangements between agriculture and environment agencies to define the objectives of cooperation, leading and support roles, information flows, resources and deliverables. The Australian Government agriculture and environment departments should enter into a Memorandum of Understanding, modelled on those with health and immigration agencies.
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**Recommendation 9** The IGAB should make clearer commitments to environmental biosecurity and include:

- the principle of ecologically sustainable development
- acknowledgement of Australia's international responsibilities under the Convention on Biological Diversity
- a program of work to determine, plan and prepare for national priority pests and diseases impacting the environment and native species
- a focus on environment and community as well as industry partnerships
- invertebrate transmitted diseases as well as animal diseases.

**COMMENT:**

PHA commends the greater focus on environmental biosecurity issues and supports the principles outlined in this recommendation.

Table 3 of the report, *Invasive Species Council Submission: Comparing industry and environmental preparedness*, is misleading since it considerably underestimates the amount of activity under existing structures that contribute to environmental biosecurity. Recent responses to incursions have been largely environmental in impact, including those for incursions of various ant species, myrtle rust and weeds. Given that the table is not verified, is inaccurate in many respects including the funding estimates, and is missing preparedness initiatives including some contingency plans and other planning initiatives that protect the environment, PHA recommends that Table 3 be removed from the report.

A new initiative in this area that the panel should note in the report is the work that PHA is doing with the International Plant Sentinel Network—an international group using plants in botanic gardens as sentinel indicators for new pests and diseases. The New Zealand Ministry for Primary Industries and some European agencies are working with PHA on this initiative. Improved environmental biosecurity will be the major beneficiary of this work as the project will enable pests and diseases of Australian native plants to be determined overseas and before they reach Australia. Australia can then develop measures to mitigate these risks.

**Recommendation 10** The Australian Government should establish the senior, expert position of Chief Environmental Biosecurity Officer within the environment department. A less preferred option is to house the position in the agriculture department. The position should report on the effectiveness of Australia's environmental biosecurity arrangements and achievements. Reports should be made publicly available.

**Recommendation 11** The NBC should establish and resource a new Environmental Biosecurity Committee (EBC), comprising government and external environment biosecurity experts and representatives from both the animal and plant sectoral committees of the NBC, to support the role of the Chief Environmental Biosecurity Officer. The role of the EBC should be reviewed following its work to prioritise national biosecurity risks impacting the environment.



#### COMMENT:

PHA does not endorse the establishment of a new Environmental Biosecurity Committee (EBC). Reform in 2008 saw the development of the EBC to oversee the biosecurity threats of invertebrates and pathogens to the environment. However, it was quickly recognised that there was no need for this additional structure to adequately protect the environment and the EBC was dissolved in early 2009. Responsibility devolved to the NBC sectoral subcommittees, notably Plant Health Committee.

This is because there is a great deal of overlap between pests that impact production and the environment. The majority of plant pests dealt with under the Emergency Plant Pest Response Deed (EPPRD) also have the capacity to impact on the environment. In recognition of this overlap, environmental consequences are already considered in the decision making processes about appropriate responses and cost-sharing under the agreement. In particular, the EPPRD includes provision for Category 1 pests which specifically addresses pests that mostly damage natural ecosystems.

Should the panel go ahead with its endorsement of the EBC, PHA suggests that the panel set a review period of either 12 months or on completion of their primary task (identifying a high priority list of environmental pests), whichever comes first.

Given the overlap between environmental and production pests PHA agrees that the position of Chief Environmental Biosecurity Officer (CEBO) be established, but strongly recommends that it be within the Department of Agriculture and Water Resources. The company considers that a CEBO in the Department of the Environment would set up a competitive dynamic that will create division.

Dividing incidents into environment and production is a false dichotomy as a few examples demonstrate:

- Honey bees supply valuable pollination services but since they are not a native species are considered by some people to be a threat to the environment.
- Agricultural crops themselves are often not native and some, such as olives, can be environmentally detrimental.
- Some introduced species are highly valued for their social amenity.

Agricultural, environmental, and social aspects of biosecurity are intertwined and not always in agreement. One department should be responsible for biosecurity issues to encourage discussion across agricultural, environmental, social and heritage issues and engagement with those sectors.

This cross-department involvement is another reason why funding for biosecurity should be at the First Ministers' level – above individual departments.

**Recommendation 12** Greater and explicit roles should be developed for AHA and PHA in environmental biosecurity, instituted through amended constitutions and expanded board expertise.

#### COMMENT:

PHA does not agree that our company constitution needs changing and does not consider that it needs new directors on the Board. PHA's constitution has always included the role of contributing to the sustainability of native flora in addition to plant industries. As a result PHA has a skills-based Board with broad experience including threats to the natural environment.

The issue that needs to be resolved is how the company would be resourced to undertake increased activity in the environmental area. PHA's subscription funding (provided one third each from the

Australian Government, all state and territory governments and industry bodies) does not adequately allow for increased environmental activity.

Extra resourcing will also be required for the broadening of PHA membership to include partners in national resource management, as well as for the increased workload of departments of the environment to work on biosecurity preparedness and response.

## CHAPTER 5 BUILDING THE NATIONAL SYSTEM

**Recommendation 13** Jurisdictions should adopt a systematic approach to determine and plan for national priority animal, plant and environmental pests and diseases.

### COMMENT:

As noted in our general comments above, jurisdictions are likely to have their own set of priorities, which will not be the same as national priorities, given that they have a different remit.

**Recommendation 14** The NBC should lead five-yearly national-level risk prioritisation for emerging animal, plant and environmental risks and pathways, in partnership with system participants, reporting to AGSOC and AGMIN.

### COMMENT:

The panel should note that biosecurity planning for particular plant industries is already carried out by industry and government experts, facilitated by PHA. Plans involve a threat analysis of emerging risks and pathways for each industry, and are reviewed at least every five years. This risk identification work by partners in the plant biosecurity system needs to be incorporated into the report.

## CHAPTER 6 RESEARCH AND INNOVATION

**Recommendation 15** The sectoral committees of the NBC, with the endorsement of the NBC, should develop an agreed set of National Biosecurity R&I Priorities, in consultation with system participants and in line with the agreed national priority pests and diseases. Priorities at a sectoral and cross-sectoral level need to be considered. The priorities should be developed within two years of the final IGAB review report, and should be reviewed every five years.

### COMMENT:

As mentioned earlier, PHA has established a mechanism to discuss and determine priorities from a regulatory perspective through interactions with NBC and PHC and its subordinate committees. In addition, the Plant Biosecurity RD&E Strategy Implementation Committee facilitates workshops on plant biosecurity topics such as diagnostics or whiteflies and their associated viruses. Attendance at these workshops comprises regulators and researchers from government and industry representatives. This mix of all the key stakeholders enables the optimal plant biosecurity RD&E outcomes to be determined in a collaborative partnership approach.

## CHAPTER 7 STRENGTHENING GOVERNANCE

<b>Recommendation 16</b>	A future IGAB should remain an agreement between the First Ministers of the Australian, state and territory governments.
<b>Recommendation 17</b>	First Ministers should, within IGAB2, identify lead ministers and agencies for biosecurity (assumed to be agriculture or primary industries) and require supporting whole-of-government arrangements to be in place, including through memoranda of understanding.
<b>Recommendation 18</b>	First Ministers should formally establish the NBC and articulate its Terms of Reference in the IGAB.
<b>Recommendation 19</b>	The NBC should include the CEO of the Australian Local Government Association (ALGA), and the New Zealand Government be invited to include a representative.

### COMMENT:

PHA endorses formal establishment of the NBC by First Ministers, and as stated earlier, we think that the panel should go further, recommending that funding commitments should be made at First Minister level as well. Biosecurity is of fundamental importance to the Australian way of life and, accordingly, warrants high priority.

Evaluation of effectiveness is important also, but we ask that the panel acknowledges the role that the annual edition of the National Plant Biosecurity Status Report already plays in monitoring the plant biosecurity system. IGAB is part of the system monitored, but not the only aspect included in the report.

PHA also agrees that it is appropriate for New Zealand to participate in most of the NBC activities, although there may be some issues of Australian market access that need to be dealt with separately.

Since councils have important roles to play in mitigating risk, local government needs to be included more formally in Australia's biosecurity system. However, PHA is not convinced that ALGA membership of NBC is the most appropriate mechanism. We suggest that further thought goes into the most effective way to engage local governments nationally, perhaps on an issue-by-issue basis.

<b>Recommendation 20</b>	The NBC should adopt a sub-committee structure that aligns with the revised national biosecurity system objectives and national reform priorities in the IGAB. All NBC working groups and expert groups should be task-specific and, wherever possible, time-limited.
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### COMMENT:

PHA does not see the need for a revised sub-committee structure, given the effectiveness of the current sub-committee structure. Recent reforms to the sub-committee and working group structures under NBC have ensured alignment with national reform priorities in the IGAB and that groups are task specific and timebound.

Figures 6 and 7, current and proposed governance structures need a considerable amount of revision.

Figure 6 omits a large amount of PHA involvement that needs to be included:

- PHA is a non-voting member of the National Management Group under the EPPRD, not an observer. (This is a difference between AHA and PHA, with AHA being an observer at the NMG under the EADRA).
- PHA is a member of the National Communication Network.
- PHA is often an observer on the National Biosecurity Management Group (NEBRA).
- PHA is a member of the Training Specialist Task Group and the Evaluation & Lessons Management Specialist Task Group.
- PHA has staff actively involved in all the following subcommittees and workgroups: SDQMA, SPHD, SNPHS, Network Implementation WG, General Surveillance WG. Also the NBC Weeds Taskforce, which is missing from the diagram.

Figure 6 is incorrect in that the National Management Group is not a group formed under IGAB or AGSOC. An NMG formed under the EPPRD is different than one formed under the EADRA or NEBRA. In the plant world, its full title is the National Emergency Plant Pest Management Group (or NMG) and its membership and governance structure is as per the provisions of the EPPRD. PHA expresses strong concerns that the NMG formed under the EPPRD is being reflected as a 'government' body—only the government members can be the same between the EADRA, NEBRA and the EPPRD.

PHA is happy to assist in ensuring that the figure is accurate.

Similarly, the summary proposed governance structure in section 7.4 (second last dot point) recommends merging the National Management Group and the National Biosecurity Management Group (NBMG). This reflects a fundamental misunderstanding of how the emergency plant pest response system works. Contrary to the statement that "they have identical membership", the National Emergency Plant Pest Management Group (referred to as NMG) and the National Emergency Animal Disease Management Group (also referred to as NMG) do not have the same membership as the NBMG. They cannot be merged.

PHA objects in the strongest terms to the inclusion of PHA and AHA in the proposed governance structure only at the subcommittee level. As the conduit for industry and government partnerships, a central pillar of the biosecurity system, it is essential that PHA and AHA are members of NBC.

**Recommendation 21** The NBC should take steps to increase its public profile and openness, including establishing a stand-alone website. The website could be maintained by, but be separate from, the Australian Government Department of Agriculture and Water Resources, and could accommodate and centralise all information on the NBC, its committees, and their activities. Key policy frameworks, agreements and reports of the NBC should be made publicly available on the site.

#### COMMENT:

PHA supports improving transparency of the workings of the NBC where possible including the committee's work program and other key information being available on the web.



<b>Recommendation 22</b>	AGSOC should establish and provide oversight to an independent IGAB Evaluation Program to assess and report on implementation of each jurisdictions' commitments under the IGAB. The evaluations, or a summary of them, should be made publicly available following ministerial consideration.
<b>Recommendation 23</b>	The NBC should clarify core commitments of jurisdictions for use in the independent IGAB Evaluation Program to be documented in a future IGAB.
<b>Recommendation 24</b>	The NBC should report annually to AGMIN on its progress of priority reform areas. The NBC's work program and annual report should be made publicly available upon ministerial consideration.
<b>Recommendation 25</b>	AGSOC should establish, as a priority, an Industry and Community Advisory Committee to provide advice to the NBC on key policies and reforms.

#### COMMENT:

PHA supports Recommendation 22 as well as 29 in the interests of a true partnership characterised by transparency, trust and accountability to each other.

PHA has reservations about the proposed Industry and Community Advisory Committee as a mechanism for achieving consultation. The sheer number of interest groups and potential risk creators that comprises "industry and community" makes it unlikely that such a committee would cover all types of commodities and interest groups, and unlikely that it would achieve a consensus position on actions and activities. It would not effectively reflect the concerns of Australians nor would it be able to disseminate information to the broader community.

Should the panel go ahead with the establishment of the committee, it is strongly recommended that it be time limited, and that the existing structures for industry and community engagement are maintained and strengthened. This includes the AHA and PHA industry forums, biosecurity roundtables and initiatives underway to make the activities of NBC more transparent.

An alternative suggestion for effective consultation is to engage with particular industry and community groups on specific issues. This would allow interested groups to make a submission on issues that affect them, and raise awareness of aspects of biosecurity at the same time.

<b>Recommendation 26</b>	The NBC should convene a dedicated annual national Biosecurity Roundtable for AHA and PHA members to provide direct input to the NBC.
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#### COMMENT:

Further to our earlier comments, industry consultation mechanisms are endorsed by PHA. The panel should note that NBC has previously taken part in PHA and AHA forums, which was beneficial to all parties.

## CHAPTER 8 FUNDING OUR NATIONAL SYSTEM

<b>Recommendation 27</b>	The NBC and the Industry and Community Advisory Committee, in consultation with other key stakeholders, should revise the National Framework for Cost Sharing Biosecurity Activities to enable its practical application.
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**Recommendation 28** The NBC, with key industry and non-government partners, should agree uniform and fully inclusive categories of funding activity for the national biosecurity system.

**COMMENT:**

PHA sees that the idea of categorising funding activities and identifying appropriate funding sources is itself sound, but wishes to note that in practice it is very difficult to identify the beneficiaries of biosecurity activities. A large proportion of biosecurity activities pre-border, at the border and post-border impact all Australians, justifying payment from general taxation, and delivered via appropriations, with minimum mandatory funding that is indexed to maintain value.

Table 8 *Commodities with a production value of more than \$100 million not covered under existing emergency response deeds*, is not strictly correct. The mushroom industry has not participated in any preparedness work with PHA, and pasture & lucerne hay is currently a gap in the system. However, tomatoes and cut flowers have a biosecurity plan each, silage and hay is covered to a major extent by the grains industry, and PHA has begun engaging with the turf industry.

PHA notes that there is a passenger movement charge to pay for foot and mouth disease prevention activities and suggests that another charge is raised for plant biosecurity, since plant industries have made an equal or greater contribution to GVP as livestock industries for decades.

PHA notes that the Senate inquiry recommendation that “the department conduct a review of the process to establish and amend agricultural levies including modifications to levy components” is being undertaken by the Levies Task Force within the Department of Agriculture and Water Resources. The recommendations from the Task Force will be critical in future options for funding industry initiatives.

**Recommendation 29** The IGAB should include an ongoing commitment to the funding stocktake, with governments publicly reporting their expenditure and the high-level stocktake results under uniform and fully inclusive categories.

**Recommendation 30** All governments should review their current biosecurity expenditure, with a view to redirecting funding into areas that return the highest yields to farmers, industry and the community. This approach will require a planned and coordinated strategy of engagement and communication.

**COMMENT:**

PHA supports transparency of government expenditure on biosecurity in order to foster trust with the other biosecurity partners, industry and community.

We note that Recommendation 30 seems to be at odds with Recommendation 4 which directs efforts to pests that impact market access. In addition, environment needs to be added to farmers, industry and the community.

As noted in general comments above, PHA considers that a funding agreement should be made at the level of First Ministers to ensure that the biosecurity system is adequately resourced on an ongoing basis, reflecting its fundamental importance to the Australian economy and way of life.

**Recommendation 31** The Risk Return Resource Allocation model should be extended to include all jurisdictions and their investments, with the Australian Government providing assistance to jurisdictions to build national capacity.

**Recommendation 32** AHA and PHA should coordinate an industry stocktake of national biosecurity system investments, making the results publicly available.

**COMMENT:**

While PHA could make such a stocktake, it would be an expensive task with no suggested funding mechanism. PHA suggests that cataloguing current risk mitigation efforts and assessing each industry's adequacy would be more effective. (Note that this is done to a certain extent in the National Plant Biosecurity Status Report each year.) It would be a very difficult task to do well, since biosecurity is intrinsically linked to good agricultural practice and thus hard to specify.

**Recommendation 33** The emergency response deeds for aquatic animals and exotic production weeds should be finalised within 12 months.

**COMMENT:**

PHA agrees that national arrangements to cover existing gaps such as exotic weeds of production including pasture pests and aquatic animals are urgently needed.

PHA has invested considerable effort in working with all relevant parties to attempt to bring the 'weeds deed' to fruition in addition to activity on the Exotic Weeds Taskforce (reporting to NBC), as well as providing substantial in-kind support to the consultants working on the aquatic deed. The panel should note that in addition to weeds, it is crucial that pests of pasture, also a cross-sectoral (plant and animal) issue requiring a framework, are covered in this national agreement.

Regarding the specified time frame for development, PHA considers that the emphasis should be put on ensuring that consultation and engagement are undertaken effectively, rather than within one year. An independent body with experience in this area such as PHA would make a suitable organisation to take on the role, facilitating a ratified framework for responding to exotic weeds of production by 2018-19.

**Recommendation 34** State and territory governments should review their biosecurity cost-recovery arrangements to ensure they are consistent, appropriate and transparent.

**Recommendation 35** All levels of government could help meet their budgetary challenges by reviewing biosecurity levies and rates/charges currently or potentially applying to system participants. These should be commensurate with agreed national cost sharing principles, which the Review Panel considers should be reviewed.

**COMMENT:**

PHA notes the suggestion made by the review panel regarding the introduction of an incoming passenger charge as an option to fund specific components of the national biosecurity system. PHA would support such an expanded source of funding to be given greater consideration in the review document, as highlighted in our initial submission.

## CHAPTER 9 MEASURING SYSTEM PERFORMANCE

<b>Recommendation 36</b>	The NBC should establish a time-limited task group to progress development of a performance framework and performance measures for the national biosecurity system.
<b>Recommendation 37</b>	The Australian Government should facilitate development of an integrated, national biosecurity information system to provide a common platform for all jurisdictions to share and access biosecurity data and information in the national interest.
<b>Recommendation 38</b>	Data and knowledge sharing should be a core commitment of jurisdictions under the IGAB. Minimum standards and specifications should be agreed for data sets.

### COMMENT:

PHA reiterates its call for government cooperation to roll out the *AUSPestCheck* system to facilitate data and knowledge sharing between governments and, in keeping with the partnership approach to biosecurity, also with industry. This meets one of the recommendations from the National Plant Biosecurity Strategy, endorsed by stakeholders nationally in 2010.

With support through Department of Agriculture and Water Resources funding, PHA has developed an effective system based on rigorous data standards that is favoured by Plant Health Committee, Animal Health Committee and the Invasive Plant and Animal Committee as well as industry and state governments.

In our view, Recommendation 37 should be:

‘The Australian Government should facilitate a common information architecture framework (including data sharing protocols, standards and authority protocols) in partnership with jurisdictions and industry to share and access biosecurity data and information in the national interest.’

<b>Recommendation 39</b>	The Australian Government should establish, within the Department of Agriculture and Water Resources, a dedicated National Biosecurity Intelligence Unit, to coordinate and provide advice to the NBC, AGSOC and AGMIN on biosecurity intelligence covering emerging risks and pathways, and international and domestic pest and disease detection.
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### COMMENT:

PHA agrees that a dedicated National Biosecurity Intelligence Unit that coordinates and provides advice on biosecurity intelligence covering emerging risks and pathways, and international and domestic pest and disease detection would boost the strength of the system. Information should be collated and, again emphasising the partnership approach to biosecurity, we strongly recommend disseminating to other stakeholders, not only to governments.



## CHAPTER 10 A FUTURE SYSTEM, A FUTURE IGAB

**Recommendation 40** Jurisdictions should adopt the proposed new priority reform areas and associated work program for IGAB2, and amend the IGAB in line with proposed revisions.

### COMMENT:

The vision for the future of plant biosecurity has already been agreed by Australia's government and industry partners, as laid out in the National Plant Biosecurity Strategy (and the 2015-2020 Implementation Plan). It should be given greater prominence in the report's final chapter.

Another issue that could be included in the report is that there has been discussion for some time that the future system would involve one deed, one entity, in order to avoid gaps in coverage across sectors. However, this could only be made real if the industry and government signatories to the national agreements agree to the change. Currently there is much concern that a single entity would not allow for a balanced approach to biosecurity risk mitigation. A case would have to be made to demonstrate benefit to all parties before such a change could be made.

Along with greater acknowledgement of the role of industry in a future system, the panel would be wise to recommend greater engagement by all Australians in the future, as discussed earlier. Biosecurity measures need to be normalised—become part of what all 'good citizens' do.

PHA recommends that a list of specific outcomes is set as a goal for five or ten years ahead. This is the approach used in the New Zealand Biosecurity Statement which has a series of concrete targets for 2025, including having a large proportion of the population understanding what the term biosecurity means and how it is relevant to them.

## Corrections

Figure 2 Recent activity in Australia's biosecurity system

- Myrtle Rust (Tas) is noted as occurring in 2010 which is incorrect. Myrtle Rust was detected in NSW in April 2010. The Tasmanian incursion was several years later.
- Under 'Plant incursions' there are a number of non-plant related incursions such as RIFA, red witchweed and Macau paper wasp.
- Under 'Plant incursions' a significant number of additional incursions (including responses) are missing from the timeline. These include sugarcane smut (failed eradication), grapevine leaf rust (successfully eradicated), khapra beetle (successful eradication in WA and under eradication in SA), Varroa jacobsoni (under eradication), European house borer, Russian wheat aphid, potato spindle tuber viroid, vegetable leaf minor, and there are others.

Table 2 (Nationally funded emergency responses)- The figures in the table are incorrect and should be as shown overleaf.

	Total	Commonwealth	State/territory	Industry
Khapra beetle	2.56	1.02	1.02	0.52
Exotic fruit flies	1.23	0.49	0.49	0.25
Giant pine scale	6.37	1.59	1.59	3.19
Banana freckle	24.34	6.08	6.08	12.17
Chestnut blight	3.89	1.55	1.55	0.079

Further, the amounts shown are only those that NMG agreed to cost share, and do not reflect the true costs involved. Figures do not include normal commitments, in-kind contributions and industry costs associated with management changes. Accordingly, the table should be amended and relabelled to make it clear what the figures represent.

Figure 2 of the report is misleading and needs revision. Pink circle exotic pest incursions are labelled as “being managed by jurisdiction” without any mention of the efforts and costs that industry makes in managing these pests. (There are also many incursions missing from the diagram, so it is misleading.) Again, PHA is willing to add missing information.





Improving national biosecurity  
outcomes through partnerships

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