

17 March 2017



Department of Agriculture and Water Resources
Via email: nebrareview@agriculture.gov.au

Re: NEBRA Five Year Review Discussion Paper

The National Farmers' Federation (NFF) welcomes the opportunity to make a submission to the National Biosecurity Response Agreement (NEBRA) Five Year Review Discussion Paper. The NFF is the peak national body representing farmers and, more broadly, agriculture across Australia. Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council.

The NFF advocates for a strong, robust and science-based approach to biosecurity and thus welcomes a review of NEBRA with the goal to strengthen emergency response to environmental biosecurity breaches. The NFF advises that NEBRA should remain an agreement platform and a guiding framework for emergency biosecurity response.

NEBRA as part of Australia's biosecurity ecosystem

The NFF is of the view that NEBRA should not be considered in isolation but rather be seen in the context of the broader biosecurity framework. This includes taking into account the concurrent review of the Intergovernmental Agreement on Biosecurity (IGAB).

While biosecurity in its broadest sense underpins Australian agriculture, it also underpins the health of Australia's ecosystem at large, and farmers already conduct environmental biosecurity activities on their properties that benefit the whole community without being reimbursed. NEBRA does not at present reflect the relationships and connections between scientists and agricultural industry experts, and the NFF strongly recommends NEBRA to better engage Regional Biosecurity Groups.

The NEBRA structure should have improved communication channels and transparency with both the Emergency Animal Disease Response Agreement (EADRA) and the Emergency Plant Pest Response Deed (EPPRD) to enhance agricultural industry engagement and expertise. There is a need for rationalisation and simplification and the NFF judges it crucial to set up a single Data Point for information sharing about biosecurity breaches and managing the interface between environmental and agricultural biosecurity incursions.

Funding environmental biosecurity

The NFF is concerned that the NEBRA review considers encouragement of "industry and private beneficiaries in cost sharing arrangements¹" for environmental biosecurity measures that have, according to the NEBRA definition of nationally significant biosecurity incidents, predominantly public benefits. For this reason, the NFF does not support the setting up of

¹ Page 5 of the NEBRA Five Year Discussion Paper

another levy on agricultural produce to fund another Research and Development Corporation for environmental biosecurity purposes. To better spread the costs of these environmental biosecurity measures, the NFF would suggest the NEBRA review to investigate the option of an incoming passenger charge as outlined in the IGAB review.²

Triggering NEBRA

At present, NEBRA can only be activated after a biosecurity incursion has been analysed with certainty and after causative agents have been determined. Additionally, NEBRA requires multiple analyses regarding risk and cost-benefit. This process significantly and unnecessarily delays important biosecurity measures to curb the impact of exotic pests and disease incursions. The NFF therefore recommends to provide more clarity around the thresholds which trigger a NEBRA response, including audits and reviews about previous responses.

Measures of success for a healthy biosecurity system need to consider improved awareness and understanding of biosecurity risks among the general public. Hence, there needs to be effective measurement of community understanding on biosecurity, captured on a regular basis. In addition to community awareness, there needs to be a strategic network of skilled biosecurity officers with search and detection expertise, looking out for new biosecurity incursions.

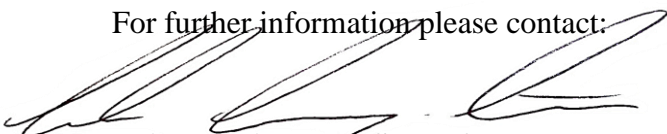
Increased biosecurity risks in the era of globalisation

International trade and travel come with increased exposure to pests and diseases, and it is highly likely that Australia's largely unblemished biosecurity record will be compromised in the future with known and unknown pests and diseases entering Australia. For this reason, the NFF recommends to amend NEBRA's trigger mechanism to better reflect the complex and interconnected world Australia's biosecurity mechanism operates in.

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

A good national biosecurity system needs to be the responsibility of everyone in Australia. This requires a change in culture and a change in the current biosecurity approach. It is crucial to shift the way we talk about biosecurity and the way we treat threats and outbreaks. Reporting on biosecurity threats and incursions needs to be non-punitive, easy and risk-free for the reporter to enable Australia's national biosecurity system to better respond to incursions.

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² IGAB Independent Review Panel, *Intergovernmental Agreement on Biosecurity Review Draft Report*, Department of Agriculture and Water Resources, 2016, page 57 and page 89.