



DAFWA SUBMISSION TO NEBRA FIVE YEAR REVIEW

Thank you for this opportunity to provide a written submission to the review and implementation and effectiveness of the National Environmental Biosecurity Response Agreement (NEBRA).

As the Department of Agriculture and Food Western Australia (DAFWA) and the Western Australian Biosecurity Senior Officers Group (BSOG)¹ had representation at the community stakeholder and government workshop in Perth facilitated by KPMG, this submission will address strategic issues as opposed to implementation/operational ones.

Given the limited use of NEBRA by government agencies in Western Australia (WA), the overriding questions are whether NEBRA adds value to biosecurity in WA or whether there is a future role?

1. Purpose of NEBRA

In Western Australia, government agencies that deliver biosecurity management; being the DAFWA, Department of Parks and Wildlife (DPaW), Department of Fisheries (DoF), Forest Products Commission (FPC) feel that there is a lack of clarity and uncertainty when NEBRA can be applied or why a NEBRA response has not been supported. For NEBRA to remain relevant into the future it needs to have clearer and transparent guidelines.

2. Roles and responsibilities under the NEBRA

The roles and responsibilities under NEBRA have been appropriate in the limited cases where it has been applied. Under WA's *Biosecurity and Agriculture Management Act 2007* (BAM Act) and the *Fish Resources Management Act 1994* (FRMA) and imminent *Aquatic Resources Management Act 2016* (ARMA Act)² the state has the power to respond to terrestrial and aquatic incursions.

3. Decision making and governance

It is noted that there is not a strong environmental representation on the National Biosecurity Council (NBC). It is important that for NEBRA to be successful it has to have an 'owner' as is the case with Animal Health Australia (AHA) for Emergency Animal Disease Response Agreement (EADRA) and Plant Health Australia (PHA) Emergency Plant Pest Response Deed (EPPRD). It may be difficult to identify industry participants.

¹ BSOG is Western Australian State Government agencies responsible for the leadership and management of animal and plant biosecurity programs and emergency responses in Western Australia. The partner agencies are: Department of Agriculture and Food Western Australia (DAFWA), Department of Parks and Wildlife (DPaW), Department of Fisheries (DoF), and Forestry Products Commission (FPC)

² The ARMA was passed in 2016, and is expected to come into effect in January 2018, so the current FRMA is still in effect until then.

4. Delivery of response activities

In the case of environmental pest or disease incursions, there are no rapid response teams that can be mobilised quickly as is the case in plant and animal responses.

5. Information sharing

The lack of transparency around NEBRA decision making may stem from the fact that there is no equivalent to the AHA or PHA. Such organisations have a budget for communications, engagement and an overarching governance role. With no 'owner' there is no single entity to drive NEBRA outcomes and support the environment in relation to biosecurity and to coordinate and disseminate information.

There exist opportunities to improve data sharing between agencies and governments; however this is impeded by terms of privacy and commercial-in-confidence laws.

6. Preparedness

With Western Australia being a vast state, low and scattered population, limited resources for surveillance and response from within local governments, this presents challenges of preparedness, in particular to environmental biosecurity response.

7. Funding arrangements

Funding arrangements for NEBRA differ to those of EADRA and EPPRD in that there are no government or industry allocated funds for NEBRA responses and that new funding need to be sought on an ad-hoc basis for each response. In general, Western Australia is happy with this arrangement and broadly satisfied with the equity of the cost sharing agreement.

8. Managing the NEBRA

A transition to management arrangements should be more clearly outlined in the agreement so that proper governance and decision making is formally supported.

Overall, the future of NEBRA should be addressed in light of better governance, clearer guidelines, transparency in the decision making process, and identifying an 'owner'.

Thank you for the opportunity to contribute to this process.