

## SUBMISSION

**TO:** IGAB Review  
Department of Agriculture and Water Resources  
CANBERRA. ACT.

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**DATE:** 8<sup>th</sup> June 2016

**TOPIC:** Response to the discussion paper titled 'Is Australia's national biosecurity system and the underpinning intergovernmental Agreement on Biosecurity fit for the future'.

**FROM:** On behalf of

- Australian Walnut Industry association Inc (AWIA)
- Chestnuts Australia Inc (CAI)
- Hazelnut Growers of Australia Inc (HGA)
- Pistachio Growers' Association Inc (PGAI)

we would indicate that we have considered the material in the discussion paper '**Is Australia's national biosecurity system and the underpinning intergovernmental Agreement on Biosecurity fit for the future**' and we would make the following submission.

### SUMMARY:

- ✚ Having considered the discussion paper the industries listed above strongly support the need for Australia to maintain a strong and effective Biosecurity system.
- ✚ Whatever is in place needs to be better detailed and explained to industry and the community if government has an expectation of bringing them along with the process and the decisions.
- ✚ The whole Australian Biosecurity paradigm is still very much built around the 'them' and 'us' approach. While the rhetoric is about a partnership outside of structures like Plant Health Australia there are no real government/industry partnerships in Biosecurity.
- ✚ In relation to the IGAB there is no direct link with industry and/or the producers or the community.
- ✚ The industry organisations to this submission would support the concept of reviewing the IGAB structure, implementation and decision-making to ensure going forward it is more inclusive of industry and built around a 'true partnership'. Improvements to the structure could be built around having a number of industry representatives on the IGAB and all the other related committees.

- ✚ The broad objectives detailed on page 17 of the discussion paper are still relevant. The real issue is how the objectives are implemented and how industry and growers are engaged.
- ✚ The answer to question 6 is simple – the Australia’s national biosecurity system is **NOT** consistently understood by all stakeholders.
- ✚ The answer to question 9 is simple – the roles and responsibilities of stakeholders in Australia’s national biosecurity system are **NOT** clearly and consistently understood.
- ✚ We would continue to push the point that if we truly want shared responsibility then give all parties a equal and shared position ‘at the table’.
- ✚ We would generally believe that the investment principles as detailed on page 20 (question 11) are still the relevant broad principles.
- ✚ Consideration as to how a ‘risk creator’ is involved in funding biosecurity needs to be further explored.
- ✚ The aspects discussed above in relation to a truly national structure and a truly national program involving a true partnership would go a long way to establishing a more efficient and cost effective system (question 17).
- ✚ In relation to surveillance industry has consistently argued for a national surveillance methodology and information storage system that allowed for all forms of surveillance to be collected and collated.
- ✚ We believe that it is time biosecurity was built into fundamental plant research, development and extension. This fundamental principle needs to be better addressed in the consultation process going forward.
- ✚ The Australian Walnut Industry Association Inc, Chestnuts Australia Inc, Hazelnut Growers of Australia Inc and Pistachio Growers’ Association Inc believe that the current Australian national biosecurity system is fundamentally sound but can be improved by building a framework that is totally inclusive and built on ‘true partnerships’. Let’s not throw out the current system and try to build a brand new system, as has been done with other aspects of horticulture, instead let’s take the current system and modify and continuously improve it to achieve and even better system

## INTRODUCTION:

Having considered the discussion paper the industries listed above strongly support the need for Australia to maintain a strong and effective Biosecurity system. By not having some of the major exotic plant pests the nut industries in particular can retain major competitive advantages and ensure the production of high quality products for both the domestic and international markets

## DISCUSSION:

The Chestnut, Hazelnut, Pistachio and Walnut industries in considering the discussion paper would make the following overarching comments:-

- a) The 'intergovernmental agreement on Biosecurity' is as it says – intergovernmental'.

The reality is that industries like those involved with this submission are most likely similar to the majority of other plant industry organisations and have no or little knowledge and understanding of the 'intergovernmental agreement on Biosecurity'.

Certainly the grower members, that these industry organisations represent, would have no knowledge of the agreement.

As a representative of the organisations I have personally attended the majority of national biosecurity forums over the past 10 years and have heard presentations on the intergovernmental agreement but find it near impossible to relate the information back to 'grass-root' growers.

As a result it is very difficult to say whether it the current agreement is 'fit for the future'.

**But what is important that whatever is in place needs to be better detailed and explained to industry and the community if government has an expectation of bringing them along with the process and the decisions.**

- b) The whole Australian Biosecurity paradigm is still very much built around the 'them' and 'us' approach. While the rhetoric is about a partnership outside of structures like Plant Health Australia there are no real government/industry partnerships in Biosecurity.

Again having attended many of the national biosecurity forums I personally find the government 'talking down' to industry rather than talking to them as true partners.

Figure 2 on page 15 of the discussion paper highlights the point. We have two 'silos' – Animal and Plant Industries and Agriculture Senior Officials Committee (AGSOC) etc.

There is no linkage between the two silos at the top and there is very little linkage between the two 'silos' as you go down the figure. What linkages you have are all based on a one-way direction.

Some of the linkages like the one between Plant Health Australia and the National Biosecurity Committee are a broken line suggesting that it is not a 'true linkage'.

This type of chart is what I would use to try and explain the Australian Biosecurity system and any astute grower would pick up on the above points.

**In relation to the IGAB there is no direct link with industry and/or the producers or the community.**

In simple terms Figure 2 highlights a very bureaucratic structure which is not at all industry/community friendly and this is how it comes across to industry.

- c) Similarly the National Biosecurity Committee/Plant Health Committee have the same fundamental problem in that they are only comprised of federal and state agency personal.
- Consistently industry is told that biosecurity is everybody's responsibility. The Nairn Report in 1996 talked about ***"Australian Quarantine a shared responsibility"*** and Roger Beale said ***"One biosecurity A working partnership"***.
- Unfortunately at times it is clear that governments do not want to engage in a true partnership with industry.
- This is best highlighted by the lack of industry representation on these and other biosecurity committees.

**Based on a), b) and c) above the industry organisations to this submission would support the concept of reviewing the IGAB structure, implementation and decision-making to ensure going forward it is more inclusive of industry and built around a 'true partnership'.**

**Improvements to the structure could be built around having a number of industry representatives on the IGAB and all the other related committees.**

- d) **We would believe that the broad objectives detailed on page 17 of the discussion paper are still relevant. The real issue is how the objectives are implemented and how industry and growers are engaged.**

While growers deal with pests and disease issues on a daily basis they do not often then relate that to 'biosecurity'. As a result using these broad objectives as the explanation of what Australian biosecurity is all about should be 'front and centre'.

How the objectives are actually implemented is the real issue and is an underlying concern for industry.

- e) The most significant risks are
- Ability to protect the Australian borders from exotic pests. Each of the four industries has over the past years been involved, through the Emergency Plant Pest Response Deed, with one or more exotic incursions. Each has been treated differently and some have resulted in a level of frustration with the process.

The concern is the high number of border incursions over the past few years suggesting that our border security is not at its best. Alternatively we are becoming better at identifying these new incursions.

Either way the aspect of Australia's Border Security needs to be revisited and given even higher status.

- Declining government resources.  
This is a continuing risk and creates concern when the Biosecurity agencies are doing their utmost to implement the systems yet the governments 'of the day' are not supporting them with the necessary resources.  
There is a continual push for industry to cover more of the cost but there is a limit to the resources available from growers to pay for biosecurity particularly when they are covering their own costs of pest and disease management.

The development of this 'true partnership' between government and industry should include the discussions of cost sharing.

- Global trade and travel  
This risk links with border security. As global trade and travel increases so must our biosecurity system increase and be even more innovative than it currently is.

- g) The answer to question 6 is simple – the Australia's national biosecurity system is **NOT** consistently understood by all stakeholders. We would believe our comments in a), b) and c) cover some of the reasons for why the system is not understood.  
Following on from this we would agree that there is real benefit in a truly integrated national approach to biosecurity (question 7). This could be achieved through the establishment of a 'National Biosecurity Council' with representation from all levels of government (federal, state, local) and industry. This Council would have responsibility for developing a truly national biosecurity framework and system (question 8).  
The important aspect is that ALL parties at the table are there with agreed 'equality' and built around a 'true partnership'. The Plant Health Australia structure involving federal government, state governments and industry is a model that could be used in forming the 'National Biosecurity Council' but be expanded out to potentially include local government and the community.
- h) The answer to question 9 is simple – the roles and responsibilities of stakeholders in Australia's national biosecurity system are **NOT** clearly and consistently understood.  
Industry representatives who regularly participate in the biosecurity system probably have a reasonable understanding but for the 'grass roots grower' and the community they have a limited understanding.  
In reality, we have made 'BIOSECURITY' something more complex than it real is. We need to get back to the basics of protecting growers, the environment and the community from exotic and endemic pests and diseases.
- i) We would believe that the points made above and the development of a 'National Biosecurity Council' (or a more appealing name) will be a practical starting point. (Question 10).

**We would continue to push the point that if we truly want shared responsibility then give all parties a equal and shared position 'at the table'.**

- j) We would generally believe that the investment principles as detailed on page 20 (question 11) are still the relevant broad principles.  
One of the real issues is how one defines the 'risk creator' and the 'risk beneficiary'. This has been and continues to be a point of contention.

In a recent exotic incursion the hazelnut industry expressed a point that a member of the general public or an importer may bring in an exotic pest yet the industry is the one left with the responsibility (along with government) to manage the incursion. So in reality the 'risk creator' is most often not the one covering the costs of eradication or management. Somehow the 'risk creator' needs to take responsibility for the problem they ultimately cause. One suggestion was a level of insurance that could then be claimed against to cover the cost of managing the incursion.

**Consideration as to how a 'risk creator' is involved in funding biosecurity needs to be further explored.**

- k) In relation to questions 12 and 13 we would argue that through a 'National Biosecurity Council' these aspects of funding and investment/reinvestment would be discussed and through broad consultation a more effective system be established.  
Like most government systems funding is so often driven by 3 or 4 year funding cycles and within that the federal and state cycles often do not 'marry-up'.  
There is a real need to make funding of Australian biosecurity and the associated programs built around a 10 or 20 year funding model to avoid the current situation of seeing a change in government eroding the biosecurity funding because of a priority or policy change. We need to build certainty into funding to ensure certainty in planning.
- l) **The aspects discussed above in relation to a truly national structure and a truly national program involving a true partnership would go a long way to establishing a more efficient and cost effective system** (question 17).
- m) **In relation to surveillance industry has consistently argued for a national surveillance methodology and information storage system that allowed for all forms of surveillance to be collected and collated.** This would allow not only government surveillance but also grower and consultant surveillance to be added together to give a better and more comprehensive body of information.  
While we understand some work is being undertaken on such a portal there is a need to put more resources into getting a truly national system established.
- n) The Importance of plant biosecurity R, D & E. (Question 19)  
We do not dispute the importance of plant biosecurity R, D & E and we believe that biosecurity is an intrinsic part of the 'day-to-day' activities of any grower. As a result we do not see that plant biosecurity should be outside the normal aspects of the plant production cycle.  
**Biosecurity R, D and E needs to be built into all aspects of plant R, D and E and not be something separate.**

A recent discussion paper on plant R, D & E stated that "*the funding of plant biosecurity R, D & E is poorly documented and a picture of the overall source and application of funds is difficult to assemble. Most plant biosecurity R, D & E projects are funded by a range of collaborators. Funds are ultimately contributed from the Australian Government, state governments and from industry, but sourced from various government grants and allocations, and from industry levies and corporate contributions that pass through RDCs,*

*universities, CRCs and government departments before the research occurs and outcomes are generated.”*

We would indicate that much of the plant biosecurity R, D & E is undertaken as part of general plant R, D and E. This again highlights that biosecurity is built into the process and not seen as a standalone activity.

The funding of plant biosecurity as detailed above is no different to the way other R, D and E is funded – by a range of collaborators.

**We believe that it is time biosecurity was built into fundamental plant research, development and extension. This fundamental principle needs to be better addressed in the consultation process going forward.**

## **CONCLUSION:**

**The Australian Walnut Industry Association Inc, Chestnuts Australia Inc, Hazelnut Growers of Australia Inc and Pistachio Growers’ Association Inc believe that the current Australian national biosecurity system is fundamentally sound but can be improved by building a framework that is totally inclusive and built on ‘true partnerships’. Let’s not throw out the current system and try to build a brand new system, as has been done with other aspects of horticulture, instead let’s take the current system and modify and continuously improve it to achieve an even better system**

Representatives of the Australian Walnut Industry Association Inc, Chestnuts Australia Inc, Hazelnut Growers of Australia Inc and Pistachio Growers’ Association Inc, collectively or individually, would be pleased to expand on these and other issues at any time in the near future.

As all four organisations are also members of the Voice of Horticulture we would strongly support the components of their submission.

Yours faithfully,



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## **APPENDIX A: INDUSTRY OVERVIEWS**

The following is a brief introduction to each of the industries:-

### **Australian Walnut Industry Association Inc**

The major production areas in Australia are on the east coast of Tasmania, in Victoria in the Goulburn Valley near Shepparton and the Murray Irrigation Area near Kerang and Swan Hill, and the Riverina near Griffith in NSW.

Small-scale orchards are scattered in the Ovens Valley, Gippsland and Central regions of Victoria, in the NSW Southern Highlands, in the Adelaide Hills and Riverland regions of South Australia, and in south-west Western Australia.

The Australian Industry is a mix of small, older orchards and new, extensive orchards. Most orchards are family operations but these do not represent the majority of area under cultivation.

#### **Current production**

- ✚ Area: about 3,000 ha.
- ✚ Production: an estimated 7,000 tonnes a year of fresh walnuts with the 2015 production valued at \$44 million

#### **Industry potential**

Walnut production is expected to increase to 15,000 tonnes by 2020 as new orchards come into production.

### **Chestnuts Australia Inc**

About 70-75% of the total national chestnut crop is produced in north-east Victoria.

Chestnuts are also grown east of Melbourne, in central Victoria, around Orange, Southern Tablelands, Blue Mountains and Batlow in New South Wales, in the Adelaide Hills in South Australia, in Tasmania and in south-west Western Australia. Many chestnut orchards are small family owned orchards, but there are several large scale commercial plantings and the average size of new chestnut orchards is increasing.

#### **Current production**

- ✚ Area: about 1,000 ha.
- ✚ Production: an estimated 1,200 tonnes a year of fresh chestnuts with the 2013 production valued at \$7.5 million

#### **Industry potential**

Chestnut production is expected to increase to 2,000 tonnes by 2020 as young orchards come into production.

### **Hazelnut Growers of Australia Inc**

Hazelnut orchards are scattered throughout south-eastern Australia due the requirements of climate. The main production regions are the Central Tablelands of New South Wales near Orange, and north-east Victoria near Myrtleford. Hazelnuts are also grown in central and eastern Victoria and increasingly in Tasmania.

Many hazelnut operations are small orchards of up to 6,000 trees. The average size of new hazelnut orchards is increasing and they are being planted to more productive varieties. Most are family operated enterprises.

#### **Current production**

- ✚ Area: approximately 130 ha, including young orchards yet to come into production.
- ✚ Production: About 70 tonnes; expected to increase as new orchards come into bearing.
- ✚ Value: Industry has a current value of approximately \$1 million.

### **Industry potential**

By 2015, the area under hazelnut production is expected to be approaching 200 ha.

### **Pistachio Growers' Association Inc**

The major production areas are along the Murray River Valley between Swan Hill in Victoria and Waikerie in South Australia. Further plantings are in central west Victoria and Pinnaroo, South Australia. Small plantings exist in Western Australia.

A central commercial processing facility is at Robinvale in Victoria.

The pistachio industry includes a mix of medium-sized business ventures and smaller family-owned operations. The bulk of the crop is produced on medium-sized orchards.

### **Current production**

✚ Area: 900 ha (2013 data).

✚ Production: average of 1,800 tonnes in-shell per year (based on a two year average) (2016 data) with a two year average value of \$12 million.

### **Industry potential**

By 2016, the area under pistachio production is expected to increase to 1,200 ha. It is estimated that by 2020 pistachio production could average 3,000 tonnes/year (\$25 million).