



Dear Dr Craik  
Chair  
Intergovernmental Agreement on Biosecurity Review  
C/- igabreview@agriculture.gov.au.

15 July 2016

**RE: Australian Barramundi Farmers Association (ABFA) Submission to the Intergovernmental Agreement on Biosecurity Review 2016**

The Australian Barramundi Farmers Association (ABFA) is the peak body representing Australian fish farmers who produce the iconic barramundi (*Lates calcarifer*). Members produce approximately 95% of Australia's production of over 6,000t of barramundi annually, valued at \$60+M at farm gate. Barramundi is produced in all mainland states and the NT, utilising a range of production systems; land based ponds, sea cages, flow through systems, and recirculation systems. ABFA members have a program to increase Australian farmed barramundi production to 25,000t by 2025 so that Australian farmed barramundi will be the premier white fish, available in every supermarket, fish shop and restaurant in the country.

Enhanced biosecurity to maintain lifestyle, industry and environment is a key ABFA policy and we support development and implementation of a comprehensive biosecurity plan for Australia's barramundi, including both farmed and wild stocks.

There are a number of major pest and disease issues in overseas' wild and aquaculture production systems that we do not have here in Australia. If we are to remain competitive, continue to produce premium seafood and increase production, we must remain free of these problems. Biosecurity is something that cannot be compromised on if Industry is to be viable into the future.

Biosecurity breaches not only impact on farm production, but also jeopardise wild harvest, recreational fishing, Indigenous people's access to the resource for their cultural needs, and the general marine environment, ecology and biodiversity. One of the greatest threats to Australian food production and social amenity is through the introduction of aquatic pests and diseases, particularly from overseas. Experience shows that once an aquatic breach has been made, in most instances it is impossible to control, and the community and industry must live for all time with the pests and diseases.

Key elements of a sound biosecurity program include:

- Management of import risks
- On farm preparedness
- National disease management framework and response.

Management of import risks

Australia has more than enough justification for applying the precautionary principle with respect to the importation into Australia of higher risk seafood forms, whilst still allowing imports of lower risk forms of *Lates calcarifer* (and the majority of imports) such as product that is frozen, skin off and boneless. Further to this, the following activities should be undertaken:

- The ABFA feels that it is unsatisfactory to assess the import risks against the current outdated and under-informed risk assessment (almost 25 years old) that was developed before many of the current risks had been identified. This process requires updating.
- It is critical (and urgent) to undertake the necessary research to underpin the scientific basis for a new risk analysis. Existing and emerging diseases need to be identified and scientific knowledge of these diseases be updated. An option to undertake this work would be to utilise the expertise and resources

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available through ACIAR, with the Australian Industry, to assess Asian aquatic diseases and epidemiology that could end up in Australia

- Reassess the biosecurity status and risk from exporting countries, including disease status, adequacy of biosecurity in respect to farming practices, monitoring and compliance
- Assess and review the existing Australian regulatory framework to adequately manage the potentially catastrophic impacts to the Australian ecology, and to the national social and economic wellbeing that could arise from a breach of biosecurity. The risk analysis needs to consider the effectiveness of policing, especially during the introductory stage of a new regime
- Revise the existing protocols and standards once the results of a comprehensive disease risk analysis are completed, and address the risk to national biosecurity.

The ABFA believe that the Federal Government should resource and fund increased pre-border biosecurity risk scrutiny (with the associated legislative framework) on all fresh and live seafood coming into Australia that could introduce exotic pests or diseases. Although this may lead to increased regulation, the impacts to all resource users, and the broader environment, from a major biosecurity breach, would have a significant detrimental impact on the nation's productivity and amenity.

#### On Farm Preparedness

The Australian Industry has to ensure that individual farms have adequate biosecurity protocols, and that national industry responses are developed in line with AQUAPLAN.

The ABFA is working with the Department of Agriculture and Water Resources (DAWR) and the Sub-Committee on Aquatic Animal Health (SCAAH) to develop a sector-specific biosecurity plan.

#### National Disease Management Framework and Preparedness.

The ABFA supports and is involved in the process to develop an Aquatic EADRA as part of a holistic approach to national biosecurity (i.e. adequate border biosecurity, farm readiness, and a process to address disease if it enters the system). The development of an agreed process to deal with a disease incursion is seen as a critical component of the overall response, should the first two components above have failed.

The ABFA believes that it is only fair and reasonable under any AqEADRA, that if high risk imported product from high risk areas continue, with an outdated import risk analysis in place, along with an inadequate regulatory framework to protect the ecological status of Australia, the vast majority of costs should not be borne by the Australian industry, but by the risk creators. It also follows that if there is a need for stock destruction, a fair compensation scheme is a desirable objective, and it is reasonable that it be partly funded by the risk creators.

We wish to add that, along with the above, there is a need to improve the current Agvet Chemical Regulation Reform process and increase Government support to national and regional laboratories (particularly in the north) serving the aquatic animal health sectors.

We hope that your group takes on board the priority matters raised by the ABFA as you undertake your review. We welcome the opportunity to discuss these further and offer our assistance and input to the development of relevant policies and programs that promote sustainable Australian aquaculture, particularly in respect to barramundi. Please feel free to contact me if you require any further information or clarification.

Yours sincerely.



Chris Calogeras

Executive Officer - Australian Barramundi Farmers Association