



14 July 2016

Dr Wendy Craik  
Chair - IGAB Review Panel  
Mail to: [igabreview@agriculture.gov.au](mailto:igabreview@agriculture.gov.au)

Dear Dr Craik

**RE: RESPONSE TO THE IGAB REVIEW PANEL'S DISCUSSION PAPER**

The Australian Lot Feeders' Association (ALFA) the peak representative body for the grain fed cattle industry, welcomes the opportunity to respond to the Review Panel's Discussion Paper entitled *Is Australia's national biosecurity system and the underpinning Intergovernmental Agreement on Biosecurity fit for the future?*

There are close to 400 accredited feedlots in Australia and the grain fed cattle industry has a value of production of approximately \$2.6 billion and employs some 28,600 people directly and indirectly. Approximately 40% of Australia's total beef supply, 80% of beef sold in domestic supermarkets and the majority of beef industry growth over the last 15 years has been due to the expanding feedlot sector. The Australian cattle feedlot sector exports around 66% of its production to over 100 countries around the world and it relies extensively on Australia's biosecurity systems and programs that enable the industry to maintain a reputation as a supplier of 'clean, green, disease free' beef.

A summary of ALFA's response to the Discussion Paper questions is below and our more detailed response follows.

**Summary Comments:**

1. ALFA is supportive of the IGAB and its priority areas as an important first step towards formal co-ordination of biosecurity efforts in Australia.
2. ALFA would like to see greater industry involvement and collaboration in future biosecurity efforts under IGAB or its next form following this review.
3. Biosecurity is a key government/industry priority yet access to funding is increasingly proving challenging.
4. ALFA encourages jurisdictions to support/provide formal endorsement of relevant industry quality assurance or certification programs that are recognised as providing a biosecurity compliance and enforcement function.
5. ALFA is strongly supportive of a more integrated national approach to biosecurity which includes a commitment to improving harmonisation in biosecurity legislation and regulations between jurisdictions.

If you require any clarification on any of the above matters or on the response below please do not hesitate to contact me.

Yours sincerely

Bridget Peachey - Manager, Policy and  
Projects

## **ALFA's response to the IGAB Review Panel's Discussion Paper**

### **The IGAB**

- 1) Is the IGAB a suitable mechanism to underpin Australia's national biosecurity system in the future (10 or 20 years from now)? Are the consolidated priority areas still appropriate?**
- 2) What are your views on the construct, effectiveness, and transparency of the IGAB? Please provide examples.**
- 3) What practical improvements to the IGAB and/or its structure would provide for an increased, but accountable, role for industry and the broader community?**

The Intergovernmental Agreement on Biosecurity (IGAB) seeks to enhance Australia's biosecurity system and strengthen the collaborative approach between the Commonwealth and State and Territory Governments. The agreement establishes nationally agreed approaches among governments to prevent, prepare for, detect and mitigate biosecurity risks across the system and respond to, manage and recover from biosecurity incidents should they occur.

Accordingly, ALFA is supportive of IGAB as a suitable mechanism to underpin Australia's national biosecurity system in the future and also agrees that the consolidated priority areas remain appropriate. However, industry's role in contributing to Australia's highly regarded biosecurity system and preferential market access arrangements appear largely overlooked by IGAB and its governing body, the National Biosecurity Committee (NBC). More formal involvement of industry will support the "shared responsibility" principle that underpins the Australia's national biosecurity system.

The concept of shared responsibility in biosecurity is being strengthened, as evidenced by increasing deregulation in the management of endemic pests and diseases such as cattle ticks in Queensland and the national BJD management plan. However, whilst industry is recognised as a key partner in managing biosecurity, engagement with industry during both the development of IGAB and in addressing the priority areas has been limited.

In response, ALFA would like to see improved opportunities for direct engagement for industry with the NBC, preferably in a partnership model. Whilst it has been asserted that the livestock industry has been involved in the NBC to date through Animal Health Australia's (AHA) observer-body status, AHA is not a representative body of industry and also represents Federal and Jurisdictional Governments. Furthermore, whilst AHA's Industry Forum, which comprises AHA industry members exclusively, more appropriately represents industry, there are still significant sectors of industry that are not represented in this forum including agents, processors and transporters.

An example of a successful government/industry partnership is SAFEMEAT. The SAFEMEAT partnership, between the red meat and livestock industry and the state and federal governments, provides a mechanism for representation of all sectors in the red meat supply chain to contribute to achieving the highest standards of safety and hygiene from the farm to the consumer. ALFA encourages the Review Panel to consider this example when making recommendations for increasing the contribution of industry under IGAB.

### **Agreeing to risks, priorities and objectives**

- 4) Is the goal, and are the objectives, of Australia's national biosecurity system still appropriate to address current and future biosecurity challenges?**

ALFA believes the goals and objectives of Australia's national biosecurity system are still appropriate to address current and future biosecurity challenges, provided "arrangements, structures and frameworks" are inclusive of industry.

- 5) In order of importance, what do you see as the most significant current and future biosecurity risks and priorities for Australia and why? Are Australia's biosecurity objectives appropriately tailored to meet these risk and priorities?**

Under the Meat Industry Strategic Plan 2020, the Australian red meat and livestock sectors have identified investment in *Minimising the impact of emergency and endemic diseases* as having the highest benefit/cost ratio of all industry projects. The impact of Foot and Mouth Disease (FMD), for example, is reported as being the single biggest threat to Australia's livestock industries. The grain fed cattle industry is also investing significantly in research, development and adoption activities in the prevention and management of endemic diseases, including Bovine Respiratory Disease (BRD), which is the most common cause of illness and death in Australian feedlot cattle.

ALFA believes that Australia's biosecurity objectives are appropriately tailored to meet current and future biosecurity risks and priorities. However, there are concerns about whether they are being met. Whilst biosecurity is identified as the highest priority for industry, funding for biosecurity preparedness and response is reaching crisis point. Much of the grain fed cattle sectors biosecurity funding is funnelled through AHA (at \$0.13 per grain fed cattle transaction) which has remained unchanged since 1997. However, the costs and demands for new programs continue to rise, while state governments reduce their own funding contributions in this area. A loss of government extension capability through decreases in state funding in this area also increases the risk that Australia will struggle to respond effectively to an emergency disease outbreak, for example.

**6) Are the components and functions of Australia's national biosecurity system consistently understood by all stakeholders? If not, what could be done to improve this?**

A strengthened partnership between government and industry and resulting potential for greater integration and/or awareness of government and industry activities is likely to contribute to an improved understanding of the components and functions of Australia's national biosecurity system by stakeholders.

**7) What benefits (or impediments) are there in realising a more integrated national approach to biosecurity, agreed to by key partners in Australia's national biosecurity system?**

**8) What form would this best take (for example, a national statement of intent or national strategy)? What are the key elements that must be included? What specific roles do you see industry and the broader community playing in such an initiative?**

ALFA is strongly supportive of a more integrated national approach to biosecurity and believes this should include a commitment to improving harmonisation in biosecurity legislation and regulations between jurisdictions. Consistency in biosecurity legislation and regulations will enable industry to better communicate lot feeder responsibilities in biosecurity, reducing potential for confusion or misunderstanding of responsibilities between jurisdictions. This is particularly relevant for some of our larger members which manage feedlots located in a number of different states.

A co-ordinated, collaborative approach to biosecurity across governments and industry also provides opportunities to reduce duplication and leverage opportunities in investment in projects to address biosecurity awareness, prevention and management – optimising the use of increasingly limited resources.

The development of a national strategy, for example, would also provide opportunities for all stakeholders to improve their awareness of what key partners in Australia's national biosecurity system are already doing to address biosecurity within their sectors. It is essential therefore, that all stakeholders be given the opportunity to contribute to the development and implementation of such an initiative to ensure it is inclusive and comprehensively captures all of the initiatives being undertaken in biosecurity at all levels.

An example of a recently developed strategy to capture investment across government, industry and other stakeholders in addressing a nationally significant issue is the [National Antimicrobial Resistance Strategy 2015 - 2019](#). Whilst this could have benefited from improved consultation with industry, and fails to address resourcing issues, it is a useful mechanism to capture all that is happening in this area, identify and prioritise potential research and communication/adoption gaps and direct future investment.

## **Embedding shared responsibility**

- 9) Are the roles and responsibilities of stakeholders in Australia's national biosecurity system clearly and consistently understood? How might this be improved?**
- 10) What practical actions do you think governments and industry organisations can undertake to strengthen the involvement of industry and community stakeholders in Australia's national biosecurity system? Would increased involvement in decision making on and implementation of biosecurity activities help the adoption of shared responsibility?**

There is currently a mixed level of understanding in the roles and responsibilities of stakeholders in Australia's national biosecurity system. The feedlot industry has the advantage of a national quality assurance program which provides an opportunity to ensure accredited feedlots have a consistent understanding of and commitment to their own roles and responsibilities within the broader national biosecurity system. As addressed earlier this would be further enhanced through the implementation of harmonised biosecurity legislation and regulations across jurisdictions.

The process of the development and implementation of an initiative, such as a national strategy, to underpin a more integrated national approach to biosecurity would provide valuable opportunities to communicate roles and responsibilities of all stakeholders, whilst strengthening the involvement of industry and community stakeholders. It is essential however, that increased involvement by industry and the community in the development of such an initiative, both in a consultative and, where relevant, decision-making capacity, be facilitated to ensure commitment to the process and subsequent understanding and adoption of shared responsibilities.

## **Funding biosecurity**

- 11) Are the IGAB investment principles still workable? Do they still meet the needs of Australia's national biosecurity system now and in the future?**
- 12) Are governments and industry investing appropriately in the right areas? Are there areas where key funders should be redirecting investment? Can investment in biosecurity activities be better targeted? If so, how? Please provide examples.**
- 13) How do we ensure investments and investment frameworks align with priorities, while being flexible enough to address changing risks and priorities?**

The IGAB investment principles are:

- i) Activity is undertaken and investment is allocated according to a cost-effective, science-based and risk-management approach, prioritising the allocation of resources to the areas of greatest return.
- ii) Relevant parties contribute to the cost of biosecurity activities:
  - a. Risk creators and beneficiaries contribute to the cost of risk management measures in proportion to the risks created and/or benefits gained (subject to the efficiency of doing so); and
  - b. Governments contribute to the cost of risk management measures in proportion to the public good accruing from them.
- iii) Governments, industry, and other relevant parties are involved in decision-making, according to their roles, responsibilities and contributions.

These principles remain appropriate. However, ALFA is concerned with the process by which investment decisions are made and the level of involvement of industry in discussions. The unilateral decisions to withdraw funding and resource support by jurisdictions for endemic disease management programs, such as general extension services and animal identification and tracing services, has resulted in industry having to reprioritise what is already limited funding reserves.

- 14) Are current biosecurity funding arrangements still appropriate to meet the needs of Australia's national biosecurity system, now and in the future? What might an alternative or novel funding model encompass?**

Addressing biosecurity is a priority for the grain fed beef industry and much of the industry's investment in research, development and adoption programs, including surveillance activities, is targeted at this issue. However, funding arrangements for these increased investments remain unchanged, putting pressure on what is already a

limited budget. A process to determine Australia's true biosecurity priorities supported by an agreed and achievable funding model is long overdue.

As was mentioned under 5). above, the majority of the grain fed cattle sector's biosecurity funding is funnelled through AHA (at \$0.13 per grain fed cattle transaction) which has remained unchanged since 1997. However, the costs and demands for new programs continue to rise, while state governments reduce their own funding contributions in this area. In response ALFA is considering a mechanism to seek greater flexibility in the levy should increases in funding be required for specific programs, in line with changing priorities as identified under the industry strategic plan.

**15) What can be done to ensure an equitable level of investment from all stakeholders across Australia's national biosecurity system, including from risk creators and risk beneficiaries?**

Any model to determine an equitable level of investment from all stakeholders needs to consider "contribution-in-kind" by stakeholders. The grain fed cattle industry invests substantially in programs to improve its biosecurity preparedness. For example NFAS includes standards developed to minimise the likelihood of disease entry into and spread from the feedlot which are then externally audited against annually. Individual feedlots also work closely with the private sector (such as feedlot veterinarians) to deliver biosecurity preparedness training and surveillance activities.

**Market access**

**16) Are market access considerations given appropriate weight in Australia's national biosecurity system? What other considerations also need to be taken into account?**

**17) Are there ways governments could better partner with industry and/or the broader community to reduce costs (without increasing risk), such as industry certification schemes?**

ALFA strongly supports governments formally recognising compliant industry assurance or certification programs and adopting them as the basis, at least, for state legislation where they deliver an on-farm biosecurity compliance/enforcement role. For example, in Queensland, annual auditing and compliance checking is met by NFAS on behalf of government with respect to feedlots meeting their environmental responsibilities. Another example is the Victorian Department of Environment, Land, Water and Planning's recognition of NFAS under the Livestock Management Act (2010), which includes a framework for recognising industry quality assurance programs, such as NFAS, as a mechanism for demonstrating standards such as for animal welfare are met.

Government recognition and endorsement of industry quality assurance or certification programs such as NFAS is likely to encourage their adoption by more producers, thereby reducing risk as well as cost of enforcement/compliance to Government whilst increasing lot feeder understanding of their biosecurity requirements. In recognition of the role NFAS plays with government, the body that administers and manages NFAS (the Feedlot Industry Accreditation Committee) includes significant state government representation.

**18) How can the capacity and capability of surveillance systems (including diagnostic systems) underpinning Australia's national biosecurity system be improved?**

ALFA understands that the National Animal Health Surveillance and Diagnostics Program and associated Business Plan is currently under development.

**The role of research and innovation**

**19) Which specific areas of Australia's national biosecurity system could benefit from research and innovation in the next five, 10 and 20 years and why? Please provide examples.**

**20) How can coordination of biosecurity-related research and innovation activities be improved?**

**21) How can innovation (including technology) help build a more cost-effective and sustainable national biosecurity system?**

ALFA understands that these questions are being addressed through the National Animal Biosecurity R, D & E Strategy.

### **Measuring the performance of the national biosecurity system**

- 22) What does success of Australia's national biosecurity system look like? How could success be defined, and appropriately measured (that is, qualitatively or quantitatively)? What, if any, measures of success are in use?**
- 23) What would be required to ensure data collection and analysis meets the needs of a future national biosecurity system? Who are the key data and expert knowledge holders in the national biosecurity system?**
- 24) How can existing or new data sets be better used? How might data be collected from a wider range of sources than government?**

It is critical that the success of Australia's national biosecurity system is able to be measured and reported against to enable assessment and evaluation across the biosecurity continuum. One of the responsibilities of the reviewed and updated IGAB should be to devise such measures of success and identify an initiative for capturing and reporting meaningfully against them. ALFA, for example, is currently working with Meat & Livestock Australia (MLA) to establish baseline and benchmarking measures to objectively demonstrate that the industry is responsibly meeting and continuously improving on agreed standards in the production of grain fed beef including in biosecurity.

**###**