



04 July 2016

Dr. Wendy Craik AM  
Chair  
Review of the Intergovernmental Agreement on Biosecurity

Dear Dr. Craik,

On behalf of NT Farmers, I wish to present you with our submission to the above review.

NT Farmers is the peak industry body representing the interest of all plant industries in the Northern Territory (NT). NT Farmers represents the interests of grower members in horticulture, nursery & gardens, improved pastures, forestry and other supply chain partners. Plant industries within the NT is the second largest primary industries sector in the Northern Territory accounting for approximately \$270 million in production value annually, excluding forestry. The sector employs approximate 3,000 people during its peak seasons and is a valuable and expanding contributor to the NT and national economies.

Biosecurity is paramount in the eyes of farmers within the NT, as such it is a key area of focus for NT Farmers. NT Farmers undertakes significant on-farm activities promoting and ensuring the importance of biosecurity and its principles are part of normal farm management practices. It wouldn't be difficult to state with authority that farmers in the NT literally consider themselves at the frontline of biosecurity due to the proximity to our northern neighbours and the vast open plains of sparsely populated countryside.

The below comments are provided in relation to the review currently underway.

From an industry perspective, the agreement must continue to be strongly focussed on intergovernmental relations as this is an area where much confusion reigns, particularly given that industry operates across jurisdictional boundaries but governments tend to focus within their boundaries and have individual jurisdictional biosecurity plans and acts. The lack of Local Government as part of this agreement is inexcusable and must be addressed for this to be considered truly intergovernmental. Having noted above the agreement is still only an inter GOVERNMENT agreement, not an agreement between government and industry. What is telling is the diagram on page 15 of the review document where there only a one way arrow from the IGAB and NBC to the Plant and Animal Health committees, then onto PHA, etc... If industry is to be truly represented on such a body there would need to be a change in the input into decision making and not just for consultation. Would it then be an IGAB or a different mechanism?

The agreement should have the ability to create legal relations between governments as biosecurity is not a matter of *if* but *when*, as such preparedness at all levels of the supply chain and clarity about roles and responsibilities are crucial for industry confidence. Often the failures, perceived or real, is due to the complexity of where responsibilities lie.

The priority areas themselves appear adequate but further emphasis must be placed on challenges attributed to climate change, the impact of increased human movement planned or otherwise, the challenges of working within a multicultural context in particular with non-English speakers who are



a large part of the grower community in the Northern Territory and the need for greater farm level engagement. Although these are mentioned, they need to be expanded. Basically due consideration must be given to jurisdictional differences.

It is interesting to note that biosecurity appears, at least to the eye of the layman, as separate to all other types of disasters. Having headed up Economic Recovery following Cyclone Yasi, the CEO of NT Farmers, the author of this response, notes that biosecurity was not even a consideration at the time, but looking back, should have been integrated into the various stages of planning, response and recovery.

This is a document mainly targeted at Government officials, the title itself determines this. Unless industry is specifically looking to find out about intergovernmental relationships and the role that industry plays in that, one does not tend to go looking for this document. It should however be one of the primary document that industry bodies and growers are aware of as it lays the foundation by which intergovernmental relations operate.

The IGAB is mainly focussed on the responsibilities of Government to detect and address a biosecurity threat and rightly so, however the IGAB must be expanded to acknowledge the importance of protecting the economic viability of an industry and the important role of industry participants in the biosecurity system. The Objectives as stated within the current document must be expanded to read 'protection of industry supply chain and participants, including retaining the viability of the economic structures of industry', this should be the core objective as it is the primary reason the IGAB exists. The protection of human health can also be expanded and wrapped into above.

The review needs to incorporate how Local Government fit into the matrix of responsibility. This is non-existent at the moment. Local Government undertakes annual disaster management planning, response and recovery activities and is far more agile on the ground than a jurisdictional or national government, in fact under the national disaster management arrangements, local government is recognised and duly allocated responsibilities. In addition local government has resources, both human and physical that can be used for detection, response and recovery. It may be possible to integrate these comments into the Key components and features section. In addition, within this section, link the IGAB to other national disaster planning systems and arrangements, this will ensure that biosecurity gets recognised and integrated into regular planning and management systems. It may also be relevant to put some words around the relationship with Local Government into the Working Partnerships section. Have an appointee from the Australian Local Government Association to represent this sector.

Within the Interstate Trade section, ensure that the Interstate Certification Assurance system is recognised and made electronic. In fact all governments must commit to making this system electronic and web based. It is currently paper based and an absolute administrative nightmare for industry, resulting in considerable unwarranted costs. In this day and age when efficiencies, accountability and traceability are crucial, to have a paper based system is inexcusable.

The most important biosecurity risks that the Northern Territory is bound to face are due to the implications of climate change. Changing climatic conditions and weather patterns are already proving a shock to some systems and it does not appear that sufficient work has been done to



understand the correlation between climate change and biosecurity risk in the north of Australia. The Northern Territory is not a populous jurisdiction comparative to all other jurisdictions, as such climate change will provide immediate and unrelenting challenges for governments to grapple with, more than via direct human interaction. It may be easier to control human behaviour but much harder to control mother-nature.

In addition there is limited understanding of biosecurity by farmers, more so as a result of a lack of resources directed towards on-farm biosecurity. Added to this, Governments consideration of on-farm biosecurity and the role of industry bodies as the conduit to farmers, is weak at best. The lack appropriately focussed on-farm biosecurity measures is the greatest gap that NT Farmers sees and this has been acknowledged by both politicians and bureaucrats at the Federal and Territory level to be accurate, yet Governments are slow in responding to this challenge. NT Farmers has provided a solution to Government to address this gap by proposing to undertake a project to build on-farm biosecurity capability, but at the time of writing this response, is yet to hear back from the Federal Department of Agriculture and Water Resources. So much for the 'Industry Partnership Arrangements' as touted within the IGAB. If on-farm biosecurity practices are not integrated into the overarching biosecurity system, then you can be assured that commercial farming operations will be at continued risk. NT Farmers acknowledges the efforts of Plant Health Australia and the various online resources it provides to try and address this, but these are inadequate as achieving best results is done by being on the ground and face to face with farmers.

Added to above, the adequacy of resourcing at the NT government level is questionable. This appears to be more the product of a failure at the political level to give prominence to biosecurity amongst all other decisions to be made, than a lack of appreciation within the Department.

Industry and peak bodies need to play a far greater role in biosecurity than we are currently able to or resourced to do, particularly at the on-farm level. We have greater, more unimpeded access and the confidence of farmers than Government. Government on the whole continues to engage with farmers and industry at the response stage, once an incident has already occurred and usually this is to enforce some form of control. This leaves a very bitter taste in the mouth of industry and is a reason why biosecurity work by Government is unwelcomed. Government needs to work in partnership with peak bodies and industry groups at the jurisdictional level to resource them to undertake the on-farm activities in the planning stages and also during the response and recovery stages, playing roles predominantly in communications and training. It is the money of our members, through their taxes than end up in Government coffers after all. The mechanisms to do this can be through existing bodies such as Plant Health Australia, but they too need to reach out to jurisdictionally based industry bodies such as NT Farmers.

The role and responsibilities still tend to be misunderstood and to be frank are difficult to unravel. What is best would be a one pager broadly outlining the roles and responsibilities of each level of government and that of other stakeholders being developed and distributed. It is also suitable to identify whether the industry bodies are represented appropriately within the various Committees and get representation into where it is required.

Investment in biosecurity preparedness and prevention is key to the ongoing viability of industries nationally. As the old saying goes, prevention is better than a cure. This is however not to underestimate the need for resources to be directed towards all aspects of the invasion curve.



Again, if biosecurity is linked to other forms of disasters, there is the possibility to look at pooled funding and resource allocation. This may also bring about cost and resource efficiencies in the long run. Industry will continue to play a role through the provision of levy funds, it is however a difficult matter for Government to grapple with when understanding the levy system per commodity type. The complexity of this system may see some commodity sectors paying whilst others don't, this is not an easy fix and is a review in itself. It is possible to also look at financial returns through the introduction and investment in technologies and big data. Agri-tech and big data will play an increasingly viable role in the development of cost effective biosecurity solutions. More funding needs to be directed towards this developing area. This does not however mean at the costs of reducing investment into traditional hard sciences, these two need to be acknowledged as symbiotic. The role of venture capital, crowd funding, funding through non-traditional sources such as supply chain partners, food processing companies, restaurants and other avenues needs to be explored to fund the increasing role of biosecurity and R&D. The integration of biosecurity into aspects of school curriculum should also be explored.

In conclusion, the current system does need to be improved and be strengthened to ensure accountability and clarity of responsibility. All participants in the industry supply chain have a role to play and Government needs to enable this by putting in place the right policy setting and creating the empowering framework of tools, programmes and other resources.

It is very hard for industry to see the outcomes of the IGAB and even industry members who are active in the Biosecurity space struggle with the complexity and hierarchy of the various government committees and bodies that act in this area. When the CGMMV incursion hit the NT and a grower's action group was formed it was difficult to explain to growers and non-quarantine departmental staff the different roles in decision making hierarchy that affected the farms and how the timespans between decision makings seemed to follow a bureaucratic formula rather than an industry emergency process.

The industry focus is on maintaining market access for their produce in both the short and long term and then opening up more market opportunities. This can also lead to conflict with sections of the industry that may be in various states or regions with or without incursions with the state governmental biosecurity agencies lining up behind their section of the industry. The international export overlay brings the federal authorities into the picture looking to maintain Australian export and import integrity. The strength of the IGAB is how these conflicts are managed within agreement and the consistency applied by each jurisdiction. The challenge is for this consistency to be seen by industry.

A futures biosecurity system is one that will have farmers willing and engaged as part of a broader network of stakeholders, all the while understanding and being held accountable for their individual roles and responsibilities.

Kind Regards,

A handwritten signature in black ink, appearing to read 'Shenal Basnayake', written in a cursive style.

Shenal Basnayake  
CEO