



**NGIA Submission to the
“Is Australia’s national biosecurity system
and the underpinning Intergovernmental
Agreement on Biosecurity fit for the future”
Discussion Paper**

A Submission by
**Nursery & Garden Industry Australia
(NGIA)**

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Submission Summary

The Nursery & Garden Industry Australia (NGIA) is the peak national industry body representing producers, retailers and allied trades involved in the production of plants across all states and territories of Australia. In partnership with state and territory peak bodies, NGIA is responsible for overseeing the national development of the Australian nursery industry.

Nursery production in Australia has a diverse and broad supply chain with multiple end users requiring a huge crop base (approx. 10 000 plant cultivars in production) grown across a range of cropping systems including glasshouse, greenhouse, open bed and in-ground. The industry is a provider of greenlife for many other horticultural industries including forestry, revegetation, fruit and vegetable cropping as well as urban retail and landscaping.

NGIA welcomes the opportunity to comment on *'Is Australia's national biosecurity system and the underpinning Intergovernmental Agreement on Biosecurity fit for the future'* Discussion Paper released by the IGAB Independent Review Panel in May 2016. NGIA is a major stakeholder along the plant biosecurity continuum, both domestically and internationally, with a keen interest in the evolution of the national management of our biosecurity system and the roles and responsibilities of government and industry.

NGIA supports the concept of "biosecurity being everybody's responsibility or a shared responsibility" and would like to see a regulatory and investment framework that underpins this concept as opposed to a perception that government is endeavouring to cost shift, particularly in plant biosecurity.

The key points made within the response are:

1. NGIA believes that the national biosecurity system must have a coordinating framework to maximise efficiencies and maintain and enhance the efficacy of policy settings, agreed strategies and on-ground operations across all levels of government.
2. NGIA recommends IGAB add a Market Access (domestic) to the consolidated priority areas to the six contained in the agreement. NGIA believes that there are a number of areas within interstate market access that would benefit from a nationally coordinate framework including harmonisation of systems, fee for service structures, service delivery standards, policy and industry participation.
3. NGIA is concerned that with the plethora of biosecurity reviews, strategies, engagement forums, etc decision making still excludes a major stakeholder – industry.
4. NGIA believes a national agreement needs to be found on the interpretation of 'Shared Responsibility' and decision making processes need to reflect the position. There needs to be greater transparency on all activities to ensure full engagement and sharing of the responsibilities.
5. NGIA supports in principle the existing goal and objects as detailed in IGAB, however NGIA would like to see some discussion around adding a fourth objective that aims to focus thinking, activity and resources towards the facilitation of market access (national & international) based on pests established after a failure to prevent their introduction, establishment and spread.
6. NGIA considers the following as key biosecurity risks and priorities to be addressed:
 - a. The on-going reduction in funding.
 - b. Northern pathway primarily the Torres Strait and Cape York Peninsular
 - c. Failure to adequately assess material before release is a significant risk
 - d. International trade
 - e. International movement of people through tourism and business a
 - f. Internet trading across international borders
 - g. Climate change potentially increasing the range of many pests and diseases
 - h. On-farm costs associated with market access and management of plant pests
 - i. Identification and registration of agricultural enterprises
 - j. Coordination and coordination between stakeholders to reduce duplication of activities, efforts and costs

7. NGIA recommends further education and communication by government to the community and industry to growers would assist
8. NGIA believes that within horticulture there are many 'free riders' benefiting from work undertaken by industry bodies that translates to them receiving an advantage they did not contribute to achieving. NGIA believes that a legislated registration system across nursery production is required to address the inequity in investment by industry participants.
9. NGIA supports the recognition by governments of industry based on-farm certification programs (third party programs) as a mechanism to reduce costs, improve business flexibility and improve on-farm production systems.
10. NGIA supports the need for an effective national plant biosecurity RD&E coordination process with the capacity to bring all stakeholders together and understand the needs of all parties.
11. Have equal partnership of all stakeholders - Federal Government, State Governments, Industry Sectors, Commercial Organisations - to ensure engagement and transparency.

An overarching strategy for Australian Biosecurity should be developed to ensure it is well managed, resourced and coordinated. Key areas of the strategy could include:

1. Organisational framework including administrative structure
2. Biosecurity RD&E
3. Economic benefit analysis
4. Biosecurity Policy Development
5. Communication

Plant and animal biosecurity management is vital for Australia's future prosperity and essential to be underpinned through government funding. A more coordinated approach needs to be implemented to avoid the duplication of efforts and avoid the need for disjointed and seemingly constant reviews of biosecurity agreements, deeds and organisations.

NGIA Review – Summary Response to Questions

Question	Summarised response
Q1	A national biosecurity framework is required and IGAB forms a basis however industry must form a part of any future structure.
Q1	Consolidated priorities are supported with the addition of market access (domestic)
Q2	Transparency is generally poor due to IGAB being only open to government. Committees, agendas, etc. are not transparent. Industry must be included – Industry committees linking to NBC, etc. National agreement of the term ‘Shared Responsibility’
Q3	Annual review on consolidated priority areas Annual IGAB status report – outcomes/deliverables PHA as an information disseminator
Q4	Goal and objectives are supported Significant risk of government not funding adequately Greater effort in the northern pathway (Torres Strait & Cape York Peninsular) Add a fourth objective – Market access (Domestic & International)
Q5	See page 9
Q6	Duplication of effort between government(s)
Q7	Benefits of a robust, efficient and cost effective national biosecurity system
Q8	National Biosecurity Framework document (Strategy)
Q9	No – government does however industry and community vary Demonstrate to industry a shared responsibility (third party programs, flexible legislation, etc.) Remove the risk of free riders benefiting in the system without contributing Communicate and educate the community
Q10	Include industry in the decision making process (committees, etc.) Support legislative change and government to act quickly Third party program implementation (legislation required) Harmonised legislation and system (requires significant leadership)
Q11	Funding principles are sound Major risk is government meeting the investment required to apply the principles
Q12	Investment is generally targeted towards each sectors view of their position in the system Government often duplicates and doesn’t engage with industry in good faith discussions on investment – often has a political/bureaucratic flavour Government invest in surveillance at greater levels
Q13	Engage all stakeholders in the discussion and decision making processes
Q14	Government must lift base funding for plant biosecurity – industry is suspicious of funding reductions and government calls for ‘new’ funding models Varied state/territory fees and charges are unfair and place growers at a competitive disadvantage Impose a levy of inbound travellers as risk creators Impose a levy on arrival ports as beneficiaries (people and cargo) Legislated registration system for Greenlife producers to minimise free rider impacts
Q15	See above Q14
Q16	Add domestic market access to IGAB or the future version
Q17	Partner with industry on third party programs Deliver harmonised legislation across Australia allowing third party programs Partner with industry on RD&E
Q18	Include industry in all aspects of the national biosecurity system
Q19	See page 18
Q20	Implement a national RD&E Coordinating body (PHA)
Q21	Third party programs – efficiency gains, etc Improved and a modern approach to legislation development
Q22	Develop metrics in the revised IGAB or national framework
Q23	No specific response
Q24	No specific response

Introduction

The Nursery & Garden Industry Australia (NGIA) is the peak national industry body representing producers, retailers and allied trades involved in the production of plants across all states and territories of Australia. In partnership with state and territory peak bodies, NGIA is responsible for overseeing the national development of the Australian nursery industry. The nursery industry is a significant sector of the Australian horticultural industry and employs over 45,000 people in more than 20,000 small to medium sized businesses with a combined supply chain market value in excess of \$15 billion dollars annually.

Nursery production in Australia has a diverse and broad supply chain with multiple end users requiring a huge crop base (approx. 10 000 plant cultivars in production) grown across a range of cropping systems including glasshouse, greenhouse, open bed and in-ground. The industry is a provider of greenlife for many other horticultural industries including forestry, revegetation, fruit and vegetable cropping as well as urban retail and landscaping.

Depicted in Table 1 is the wide range of end users supported by the Australian nursery production industry.

Table 1: National value of horticultural sectors supplied by production nurseries

Production Nursery	Horticultural markets	Economic value
Container stock ¹	Ornamental/urban horticulture	\$2 billion retail value
Foliage plants ¹	Indoor display/hire	\$87 million industry
Seedling stock ²	Vegetable growers	\$3.3 billion industry
Native and exotic forestry stock ³	Plantation timber	\$1.7 billion industry
Fruit and nut tree stock ²	Orchardists (citrus, mango, etc)	\$5.2 billion industry
Landscape stock ¹	Domestic & commercial projects	\$2 billion industry
Plug and tube stock ²	Cut flower growers	\$700 million industry
Revegetation stock ¹	Farmers, Government, Landcare	\$109 million industry
Mine site revegetation	Mine site rehabilitation	Value unknown
Total Horticultural Market Value		\$15.0 billion

¹ Freshlogic (2008) Australian Garden Market Monitor for the Year Ending 30 June 2008

² Horticulture Australia Limited (2004) Australian Horticultural Statistics Handbook

³ Australian Bureau of Agricultural and Resource Economics (2008). Australian Forest and Wood Products Statistics

Industry Statement

NGIA welcomes the opportunity to comment on '*Is Australia's national biosecurity system and the underpinning Intergovernmental Agreement on Biosecurity fit for the future*' Discussion Paper released by the IGAB Independent Review Panel in May 2016. NGIA is a major stakeholder along the plant biosecurity continuum, both domestically and internationally, with a keen interest in the evolution of the national management of our biosecurity system and the roles and responsibilities of government and industry.

Nursery production moves a significant volume of greenlife around Australia annually including vegetable seedlings and fruit trees for commercial plantings through to plants for urban retail outlets and landscape markets contributing significantly to urban greening, food production and revegetation and forestry across Australia (Food, Fibre & Foliage). NGIA further believes this value of interstate trade is growing each year as key businesses establish new and emerging markets and opportunities for increasing plant export are being explored. The industry propagates and cultivates more than 10 000 different plant cultivars across the combined cropping systems, exposing industry to a vast array of pest and disease threats, therefore the management of the biosecurity continuum is of critical importance.

Production nurseries are the cornerstone in the supply of starter plants for the majority of horticultural crops, both urban (foliage) and commercial (food/fibre), having the expertise in propagating and growing starter plants for a range of horticultural enterprises targeting various domestic and international markets. This expertise includes seed germination, raising and growing, grafting or budding on pest/disease resistant and/or vigorous rootstocks, rapid multiplication of true to type, high yielding, high health and disease resistant plant varieties through tissue culture.

The industry is also the primary sector for the identification, introduction and propagation of new and improved plant varieties across most production categories in the food, fibre and foliage sectors. These skill sets and the expertise of industry exist nowhere else in horticulture thereby making nursery production a critical component in the supply chain of our urban greenlife and food/fibre horticultural products. The nursery industry is a key component for increasing farm productivity through the introduction of higher yielding varieties, increasing disease resistance and improving drought tolerance due to the development of hardy and new varieties plus the grafting of high yielding species to appropriate root stocks.

NGIA supports the concept of “biosecurity being everybody’s responsibility or a shared responsibility” and would like to see a regulatory and investment framework that underpins this concept as opposed to a perception that government is endeavouring to cost shift, particularly in plant biosecurity. NGIQ also expects a concerted effort be made towards reducing unnecessary regulatory burden on industry as well as looking at alternative, flexible and practical solutions to a range of issues confronting the effective operation of plant biosecurity in Australia.

Nursery production has had a growing investment in biosecurity resource development over recent years through statutory levy investment, under the current horticulture RDC, along with being a member of Plant Health Australia and a signatory to the Emergency Plant Pest Response Deed (EPPRD). Production nurseries across Australia are also being charged for every biosecurity service provided by all levels of government adding to the industry investment along the biosecurity continuum.

The industry has recently committed to two key biosecurity programs over the next 5 years (2016 – 2020) totalling more than \$5 million and has been engaging with other sectors of horticulture in cooperative projects and is a committed signatory to the Emergency Plant Pest Response Deed being one of the initial 10 signatory partners. NGIA is a strong supporter of nationally coordinated biosecurity engagement as demonstrated by its commitment to various support committees including the Plant Biosecurity CRC Horticulture Advisory Panel (HAP) and as an industry mentor and advisor to PBCRC projects including Myrtle Rust and Collaborative Planning.

NGIA Review Response

Question 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?*

NGIA believes that the national biosecurity system must have a coordinating framework to maximise efficiencies and maintain and enhance the efficacy of policy settings, agreed strategies and on-ground operations across all levels of government. IGAB is a positive attempt at achieving coordination with recognition that the system can be improved, and a willingness to review IGAB and consider stakeholder input, suggests to NGIA that IGAB is a suitable mechanism, noting NGIA changes in this response, underpinning the national biosecurity system. Industry must have a greater role in the future of IGAB as a contributor and as a stakeholder in the national biosecurity system.

NGIA supports the ‘Consolidated priority areas’ as they are listed (1 – 6) with a suggestion to add one more priority area due to the significant impact it has on plant based industries. With an average of more than 30 emergency pest incursions recorded per year across Australia, most impacting on plant production, the aftermath is left to industry to manage, generally at a farm level. This can have a significant impact on individual growers, or entire sectors, depending on the pest,

host(s) and effect on national/international trade and the resulting movement controls put in place by Australian jurisdictions. With jurisdictions consistently failing to fund plant health at an adequate base level biosecurity agencies are clawing back funds through growers via fee for services provided for market access. NGIA believes that this is a significant threat to our national biosecurity system whereby cost pressures and/or poor service delivery could lead to regulatory evasion by industry. NGIA believes that there are a number of areas within interstate market access that would benefit from a nationally coordinate framework including harmonisation of systems, fee for service structures, service delivery standards, policy and industry participation.

NGIA recommends IGAB add a Market Access (domestic) to the consolidated priority areas.

Question 2. *What are your views on the construct, effectiveness, and transparency of the IGAB? Please provide examples.*

The IGAB construct is still based on the past 200 years of managing biosecurity across Australia with the participants being restricted to government agencies with the exclusion of other stakeholders. This also extends to the various committees, sub-committees and working groups that operate under the remit of IGAB. NGIA is concerned that with the plethora of biosecurity reviews, strategies, engagement forums, etc decision making still excludes a major stakeholder – industry. Starting with the 1996 Nairn Review ‘*Australian Quarantine a shared responsibility*’ and moving onto the 2008 Beale Review ‘*One Biosecurity A Working Partnership*’ and multiple state/territory reviews culminating in the recent 2016 Queensland Government ‘*Biosecurity Capability Review*’ the concept of ‘Shared Responsibility’ seems to settle on extracting funds from industry to the exclusion of decision making.

NGIA does not consider ‘engagement or having input’ as being a part of the decision making apparatus as history has shown this is often a ‘process’ driven activity with decisions still made by government to suit government agendas. NGIA has for some time suggested that industry should be represented at all levels of decision making including NBC, PLC and SDQMA to name a few. Presently attendance at and participation in these committee deliberations is at the discretion of the Chair – generally government representatives.

NGIA further comments on transparency of these bodies under IGAB and suggests that information made available under ‘communiqués’ is heavily filtered and with little input from industry to agendas and topics is of concern. It is interesting to note that to the best of NGIA’s knowledge none of the IGAB committees have asked for industry’s input, when industry does have an opportunity it is invariably as a result of industry pursuing the opportunity. Furthermore, the national committees consistently withhold information on the failings of various government agencies from stakeholders including service delivery capacity, funding levels, system failures, etc. NGIA believes a national agreement needs to be found on the interpretation of ‘Shared Responsibility’ and decision making processes need to reflect the position. There needs to be greater transparency on all activities to ensure full engagement and sharing of the responsibilities.

Question 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?*

Practical improvements to IGAB follow on some of the above comments which centre around engagement and the serious consideration of industry nominated concerns and issues along with decision making participation.

- NGIA would like to see an annual assessment of the IGAB consolidated priority areas, as opposed to waiting 4 years to re-visit, to review applicability/additions; and
- An annual status report of progress against targets within the consolidated priority areas.
- IGAB should increase the utilisation of Plant Health Australia (PHA) as a key conduit to industry stakeholders:
 - This would include, in the short term, transparent information flow particularly relating to PHC and NBC including opportunities to review, and potentially

contribute to committee agendas and review meeting outcomes without the heavy filtering.

NGIA believes that IGAB should establish a similar committee process for industry stakeholders paralleling PHC with the opportunity for industry to take a seat or seats on NBC. Government must reassess their thinking in the new biosecurity paradigm of 'Shared Responsibility' and begin to understand that industry is a willing participant and can add to the debate and decision making process constructively.

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

NGIA supports in principle the existing goal and objects as detailed in IGAB and points to the targeting, application and investment in achieving the outcomes that often hamper full delivery. For example, prevention of the introduction of emergency plant pests (EPP's) is a key objective supported by industry however NGIA has grave concerns about the limited, and often questionable, activities being applied to the major risk pathway of the Torres Strait and Cape York area of Queensland by both commonwealth and Queensland governments. NGIA believes that significant issues exist in the capability and capacity of biosecurity agencies to deliver against the objectives with governments continuing to restrict delivery due to ongoing budget constraints.

NGIA would like to see some discussion around adding a fourth objective that aims to focus thinking, activity and resources towards the facilitation of market access (national & international) based on pests established after a failure to prevent their introduction, establishment and spread. NGIA has observed the loss of a key underpinning reason for the existence of biosecurity agencies which is to facilitate trade, within the context of a robust system, at the least cost. The IGAB identifies facilitating trade however at present this is linked to prevention, eradication and containment not actually getting business trading quickly and at a minimal economic and human cost.

Question 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?*

NGIA considers the following as key biosecurity risks based on importance and in the ability to action through mitigation strategies:

1. The on-going reduction in funding across all levels of government in plant biosecurity impacting on surveillance, inspections and policy development. Organisationally the agencies are understaffed yet are facing greater challenges (see below)
2. Northern pathway primarily the Torres Strait and Cape York Peninsular however if northern Australia is to be developed as proposed by government the pathway risk across all of northern Australia increase exponentially
3. Commercial plant or plant parts introduced through legal channels however a failure to adequately assess material (e.g. molecular or genetic based assessments) before release is a significant risk
4. International trade – goods sourced and arriving from sovereign states that have low production costs and poor national plant protection organisations increase the risk of entry particularly through Australia ports
5. International movement of people through tourism and business are creating ever increasing biosecurity risks
6. Internet trading across international borders by consumers who have no concept of biosecurity risk
7. Climate change potentially increasing the range of many pests and diseases that to date have been limited in distribution due to uninviting environmental conditions or limited host distribution
8. On-farm costs associated with market access and management of plant pests offering a potential risk that will see pests spread

9. Identification and registration of agricultural enterprises
10. Coordination and coordination between stakeholders to reduce duplication of activities, efforts and costs

NGIA believes that the Australian biosecurity objectives are generally tailored to meet the above risks however as mentioned above it is the will of governments to invest in mitigating the risks that will determine the efficacy.

Question 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?*

NGIA agrees with the suggestion that IGAB further develop a national guidance document (National Biosecurity Framework) that clearly articulates the components and functions of stakeholders (particularly government and industry) across the national biosecurity system. Whilst there is a general recognition that all levels of government have a high level of awareness of their function there are areas that appear to be duplicated and/or not as coordinated as industry would like. A case in point has been the often seen disconnect between NAQS and state/territory governments in activities in northern Australia surveillance and reporting. NGIA recognises that this area has improved over recent years however believes there are grounds for improvement around state/territory investment of resources and greater liaison between organisations. NGIA further points to surveillance around the nation's arrival ports that could benefit from clearly defined functions.

Under the current structure industry is not as confident as government in exactly what its function is across the entire biosecurity system with government varying in its understanding across different states and territories. Industry has a reasonable understanding of the functions around on-farm biosecurity and engagement with growers in managing biosecurity risks however this varies between industry sectors. Defining the components and functions of stakeholders would provide clarity for individual growers and also guide industry investment.

Question 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?*

The benefits achieved from an integrated national approach would see a system that reduces duplication, has agreed targets and produces resource efficiencies. This would result in a more robust system that has the potential to increase the outcomes from limited funding and help in identifying gaps and allow for a structured response in managing these areas e.g. government - industry.

Question 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?*

NGIA believes a *National Biosecurity Framework* would be the most appropriate platform from which an integrated biosecurity system could be based upon.

Question 9. *Are the roles and responsibilities of stakeholders in Australia's national biosecurity system clearly and consistently understood? How might this be improved?*

No, NGIA believes that governments, and industry to some degree, have failed to raise the overall general awareness of the importance of the national biosecurity system and the roles stakeholders have particularly the general community. This is clearly evidenced by the consistent reduction in biosecurity investment by government over the past 20 years. Industry also has a varying degree of understanding depending on their own exposure to biosecurity activities from very little where a grower supplies a local market through to an excellent understanding if a grower exports. There is also the hangover from a 200-year biosecurity system that was the domain of government with growers, in some instances, believing that this was still very much a government responsibility and

tax payer service. Government agencies generally have a very good understanding of the role and responsibilities of each however there is not the same amount of understanding around industry's role by both parties.

NGIA recommends further education and communication by government to the community and industry to growers would assist and suggests that some of the advice from previous reviews e.g. Nairn Review 1996 could be followed. Industry has come a long way in the past 10 years with the establishment of PHA and signing the EPPRD plus increased investment in on-farm biosecurity programs to assist growers reduce their biosecurity risk. At a farm level further investment by government and industry must be targeted towards the ongoing development of on-farm mitigation activities and risk reduction systems.

As previously mentioned NGIA supports greater inclusion by government of industry in the decision making process plus greater clarity and an agreed interpretation of 'Shared Responsibility' for industry.

NGIA believes it is important that government recognise industry capability and capacity to undertake functions within the biosecurity system however this will require government moving away from the traditional thinking and deliver greater flexibility to industry. This entails government providing the mechanisms for industry to participate through appropriate legislative change and support to ensure all stakeholders have an equitable contribution. Examples include nationally harmonised legislation allowing industry driven third party biosecurity programs to operate economically and efficiently and looking at systems that bring in the 'free rider' such as registration programs that ensure equity in effort and investment across industry.

Question 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?*

The notion of 'Shared Responsibility' has a range of interpretations with government and industry potentially at odds with each other. As noted in the discussion paper there is a certain degree of feeling across industry that government sees this as a means to source funding and undertake cost shifting while industry is looking to gain business flexibility and efficiencies whilst maintaining a robust biosecurity system. As previously mentioned there is considerable scope to bring industry further into and provide transparency in the decision making process. The formation of PHA and the development of the EPPRD have been great initiatives however there are still areas that government and industry can improve upon.

Industry has a significant role to play working with growers at a farm level to improve biosecurity risk management and in turn government has a role in recognising these advancements. On-farm programs that improve risk management such as BioSecure HACCP demonstrate industry is willing to take on a greater role however to value that investment by growers there needs to be drivers that deliver an economic outcome. NGIA believes the IGAB has a role to play in the rapid development of nationally harmonised legislation that allows for the market access benefits for growers implementing robust on-farm programs. Economic drivers that reward/recognise industry investment are clear demonstrations to industry that the 'Shared Responsibility' is not just a cost shifting concept driven by government.

Question 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?*

NGIA considers the IGAB funding principles to be sound and broad enough to address the needs of the national biosecurity system. The risk is more in the application of the principles, the decision making processes in applying the principles and the capacity of stakeholders to resource their obligations under the principles. In most cases government is determining the risk creators/beneficiaries as the only consideration and the public good appears to be less of a

component in assessing investment. As this currently stands government consistently places industry into one or both of the categories however fails to acknowledge its role in creating risk due to policy settings and resource investment in many cases against the preferred options of industry.

Industry has also witnessed the disproportionate reduction in government investment in plant biosecurity across Australia relevant to animal biosecurity which questions state/territory government capacity to meet their obligations. Industry faces significant pressure in sourcing general funding with most relying on industry RD&E levies that are under the control of government through statutory funding agreements. As recently demonstrated government intervention and subsequent re-drafting of guidelines creating Horticulture Innovation Australia Limited the opportunity for industry to drive biosecurity investment has been significantly reduced.

NGIA recognises that the funding principles as applied under the EPPRD are generally fair and that industry has a decision making role at this level. NGIA believes that on a more general level overall decision making processes need to have greater industry involvement and have their concerns and advice considered before final decisions are arrived at.

Question 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.*

This is a complex area with a clear response difficult to arrive at due to the overall competing areas within the biosecurity system. NGIA has focused investment in recent years on areas that improve on-farm biosecurity including electronic pest identification, resources such as factsheets, management plans, Contingency Plans, etc and the biosecurity program (BioSecure HACCP). NGIA is also a member of PHA and a signatory to the EPPRD both important areas for industry investment. As mentioned in the opening statement of this response industry believes it is targeting investment in the appropriate areas based on how industry sees its function within the biosecurity system. To achieve industry uptake requires significant investment with NGIA believing the current paradigm change in biosecurity is of a similar, if not greater, magnitude to that of the water reforms of the early 1990's.

NGIA believes that there needs to be greater consideration given to funding around industry transition to 'Shared Responsibility' including enhancing industry capacity and on-farm assistance in program uptake. Industry RD&E levies for many horticultural industries are limited with competing agendas for the research investment plus as mentioned above the allocation of priority areas is out of industry hands. NGIA believes that government has a role in assisting industry to drive uptake of biosecurity programs at farm level. This is based on the premise that growers are taking greater responsibility thereby reducing risk which contributes to the public good and has the potential to reduce costs in the long-term.

Government investment varies across jurisdictions however NGIA believes that there are areas that require consideration including:

- Surveillance enhancement
- Legislative reform – allowing flexibility, technology adoption & third party programs
- Northern Australia – enhanced surveillance and education
- Diagnostics – expertise is reducing
- Preparedness – investigate major international incursions of high threat pests to assess the efficacy of processes and procedures employed for inclusion in Contingency Plans

Note: NGIA acknowledges the Department of Agriculture & Water Resources investment in AgVet reform which will give industry access to modern pest management products significantly earlier than in the past and contributing to on-farm risk management.

Question 13. *How do we ensure investments and investment frameworks align with priorities, while being flexible enough to address changing risks and priorities?*

Aligning investment and investment frameworks with priorities will take a collaborative effort between all stakeholders operating with the clear understanding of their place and area(s) of responsibility in the national biosecurity system. The development of a National Biosecurity Strategy is a good starting point followed by the inclusion of stakeholders in the discussion and decision making process. Building consensus with stakeholders will be an important part in constructing an investment framework around the identified priorities. Currently industries are often prioritising within their own space as are governments and neither party is aware of the other which is leading to some poor connections across stakeholder investment. NGIA believes that by taking on board earlier comments from this response alignment can be achieved.

Question 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?*

The funding arrangements that exist across Australia are varied and need to be considered individually starting with a general comment that industry firstly requires government to provide an appropriate base level of funding to biosecurity agencies before seeking alternative sources. NGIA has already commented on our position relative to current state/territory investment in biosecurity however we draw the review committee's attention to the recent Queensland Biosecurity Capability Review report. The report noted that over the past 20 years or so successive Queensland governments have reduced investment in biosecurity to the point where \$30 million is required to get back to a level that improves capability that meets its obligations. The Queensland Government in the 2016/2017 budget allocated an extra \$2.7 million, a shortfall of \$27.3 million and a 10-year plan! NGIA strongly believes that this funding situation is replicated to some degree across every Australian jurisdiction providing a disincentive for industry to contribute further.

State plant health fees and charges are increasing with Queensland recently increasing plant health inspection fees from \$115 to \$193 per hour and decreasing animal inspections by 0.41¢ per hour to \$115.35. This is an unfair and inequitable situation and it threatens overall compliance across plant based industries thereby putting the integrity of the national biosecurity system at risk (potential non-compliance). This is a direct result of government not meeting its base funding obligations and not factoring in the high degree of public good when managing a biosecurity system. A final point worth noting is that due to the varied base funding provided for biosecurity across jurisdictions the cost recovery between agencies varies placing industry at a competitive advantage/disadvantage depending on the jurisdiction they reside in – not a level playing field.

NGIA is comfortable with the current funding models attached to the EPPRD and acknowledges that this is constantly being scrutinised by all parties. NGIA believes that the federal government needs to put a greater effort into bringing all plant industries into the EPPRD or alternatively implementing a mechanism through legislation to recover costs from industries outside the EPPRD if considered a beneficiary. NGIA further suggests incoming flights to Australia should be considered risk creators and a biosecurity levy attached to each passenger plus a broader consideration applied to port authorities and airport owners to contribute due to the beneficiary value they realise from the travelling public/trade. Finally, NGIA believes that within horticulture there are many 'free riders' benefiting from work undertaken by industry bodies that translates to them receiving an advantage they did not contribute to achieving. NGIA believes that a legislated registration system across nursery production is required to address the inequity in investment by industry participants.

Question 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?*

See above

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

NGIA has significant concerns that whilst in some instances market access (international) is given appropriate weight (e.g. EPPRD issues) in other areas it falls far short to the point that pathways are not managed appropriately and incursions are frequent. Demonstrating this position is the poor management of the northern pathway (Torres Strait – Cape York Peninsular) with potential for other areas across the north of Australia to increase in their risk profile. In recent years the plant pests that have ‘hopped’ down the northern pathway have been increasing probably in proportion to the reduction in resources put to managing the risks. NGIA recommends that IGAB enhance the risk rating of the northern pathway and ensure a joint effort between governments (commonwealth, State and local) is put to improving the biosecurity management.

IGAB should add the area of domestic market access when considering the national biosecurity system in its entirety. Presently IGAB has a predominant single market access focus (international) however domestic market access for horticulture is a major issue both in its complexity and cost plus the influence over international market access (area freedom, etc). NGIA believes that our national biosecurity system is exposed to fundamental risks due to an increasingly complex and costly domestic market access system. These risks are enhanced based on rising costs of compliance, poor service delivery, slow technology adoption and a failure to harmonise entry conditions and procedures across the jurisdictions, all adding to higher business costs. The threat of non-compliance is increasing as government cost shifts and reduces business flexibility in servicing various supply chains. NGIA believes this is a direct result of governments across Australia failing to fund plant biosecurity at adequate and appropriate base levels particularly in recognition of the public good.

Question 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?*

NGIA supports the recognition by governments of industry based on-farm certification programs (third party programs) as a mechanism to reduce costs, improve business flexibility and improve on-farm production systems. NGIA has been working with state/territory governments for the past 8 years in the development of BioSecure HACCP as such a third party program with the result being a national agreement for a 3-year trial for domestic market access (2015 – 2018). National third party programs developed by industry to address both domestic and national market access require supporting legislation from government. Industry can build the programs, adopt new technology and systems to support both the grower and the administration plus provide government with real-time data and certification evidence however legislation is a significant block to implementation. Governments are still applying the principles of a 200-year old biosecurity system (government has total responsibility) yet are asking for stakeholders to modernise and take a greater role, share the responsibility and abide by a general biosecurity obligation/duty of care.

There are significant advantages to be gained through government/industry partnerships around third party programs including demonstrating the shared responsibility mantra, improving overall biosecurity at farm level and reducing business cost. Third party programs have the potential to be market drivers for change at farm level and will improve grower’s adoption of ‘shared responsibility’.

IGAB must bring together all regulators and ensure that legislative change is rapidly implemented to allow for the implementation of third party programs as a priority. The legislative mechanisms must be harmonised across all jurisdictions and need to have consistent structures otherwise industry efficiency gains will be lost and administration will be costly and prone to failure. Governments must fast track the legislative changes otherwise opportunities for industry investment will close and grower adoption will be less likely.

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

Significant effort has been put to developing a number of strategies over the past 6 years aimed at addressing this particular area with NGIA unsure of the overall buy in by stakeholders. NGIA believes that there needs to be a greater commitment from government, and inclusion of industry, to achieve the outcomes under the various strategies including:

- National Plant Biosecurity Strategy
- National Plant Biosecurity Diagnostic Strategy
- National Plant Biosecurity Surveillance Strategy
- National Fruit Fly Strategy
- National Plant Biosecurity RD&E Strategy

NGIA reiterates the point that industry has not been a partner in IGAB nor in the development or implementation of the bulk of the strategies that have been driven by IGAB since 2012 therefore it is unclear on what progress has been made. Industry can play a part in improving and enhancing the capacity and capability of the national biosecurity system however government must engage with industry to develop the framework for this to happen.

Question 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?*

NGIA agrees with the broad list of potential innovation areas as detailed in the discussion paper and has a number of suggestions that feed off these, and some that may be indirectly linked, which focus on on-farm needs. With the desire by government to have industry share the responsibility NGIA would like to see more RD&E targeted at industry/farm level. Areas that would benefit from research and innovation include:

- On-farm tools to enhance surveillance (e.g. lures/traps) supported by highly automated reporting/data capture system (smartphones, etc.)
- On-farm biosecurity systems that support risk mitigation across cropping sectors including surveillance/monitoring systems supported by statistical robustness
- Research/international collaborations into new and more effective pesticides and pesticide delivery technologies (e.g. encapsulation, systemic products, etc.)
- Innovative phytosanitary treatments for live plants
- International EPP incursion and response reviews/assessments with content added to Contingency Plans for high threat pests
- Technologies that can assist government and growers in the management, assessment and administration of compliance processes

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

NGIA has stated above that the strategies developed under IGAB, including the National Plant Biosecurity RD&E Strategy, were developed at the exclusion of industry therefore they are incomplete and focused on one dimension of the biosecurity system. NGIA has not seen any overwhelming evidence to suggest that the strategy has had any significant role in coordinating RD&E except possibly in the Plant Biosecurity CRC project selection.

NGIA supports the need for an effective national plant biosecurity RD&E coordination process with the capacity to bring all stakeholders together and understand the needs of all parties. NGIA has already commented on our position for the preferred format in the submission to the Australian Farm Institute discussion paper. Briefly NGIA supports a model that has Plant Health Australia as the coordinating body with details and funding structures, etc. yet to be defined.

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

NGIA has stated above that significant gains can be made from embracing industry based programs that allow efficiencies and flexibility at farm level due to biosecurity programs melding into the business of plant production. BioSecure HACCP has the potential to reduce costs at a

farm and at government level through innovative data capture and retrieval and real-time data interrogation.

Government is often a significant impediment to achieving cost efficiencies due to the structure of bureaucracies, a general lack of business acumen and exposure to political influences/decision that are driven by external sources. Furthermore, NGIA has a strong view that government is still unable to fully adapt to the new biosecurity paradigm, therefore fails to realise gains across innovative approaches, due to the outdated policy and principles they operate under, staff that do not understand a changing dynamic and old and outdated legislation that is inflexible and over prescriptive. Government continues to prioritise areas for investment without consulting stakeholders and we see this as a wasted opportunity to work in partnership and deliver sound outcomes that can actually be implemented.

To allow innovation to provide a more cost-effective and sustainable biosecurity system stakeholders need RD&E coordination, government change across personnel and legislative mechanisms as well as an imperative to rapidly act to accommodate change. With a rapidly evolving world and very few of the stand 'knowns' remaining unchanged (e.g. tyranny of distance, isolation, etc.) government that clunks along with poorly developed legislation and internal decision making processes are a hindrance to change, will miss opportunities and are an impediment to business achieving economic gains.

Question 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?*

NGIA does not have a clear response to this question due to not having been engaged in the initial or subsequent decisions around IGAB, etc. NGIA acknowledges that there are many areas that have improved in the national biosecurity system since IGAB was signed off in 2012 with a greater effort in communication between government and industry and further participation in some of the IGAB outcomes (e.g. RD&E Priority Forum). On the current material available NGIA would see that measuring against the various IGAB strategies would be a start and if adopted the future National Biosecurity Framework would need to have measurable metrics built into the system.

Question 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?*

Identify the key success factors of IGAB and look at the systems and technologies required to measure them.

Question 24. *How can existing or new data sets be better used? How might data be collected from a wider range of sources than government?*

NGIA has indicated in the above responses that on-farm programs offer opportunities for industry to contribute to data collection however industry requires more information before a system could be assessed.