



Review of the Intergovernmental Agreement on Biosecurity
Submission from the South Australian Government
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Executive Summary

The South Australian Government welcomes the Independent Review of the Intergovernmental Agreement on Biosecurity (IGAB).

Biosecurity is managed between three agencies in South Australia: Primary Industries and Regions South Australia (PIRSA); the Department of Environment, Water and Natural Resources (DEWNR); and the Department of Health. These agencies primarily have contributed to the South Australian Government response to the IGAB review, which is structured around the general intent of the IGAB and specific issue relating to certain schedules.

The IGAB is acknowledged as an important national initiative and should continue to improve national biosecurity effectiveness, capacity and integrated systems. It is appropriate that it stays at the First Ministers level for signing and flags investment priorities to central agencies.

The following key improvements are identified in the South Australian Government response:

- A national Statement of Intent for biosecurity outlining roles of government, industry and community is needed to better engage those outside government.
- There is a need for nationally consistent methods to assess risks, impacts and benefit:cost of pests and diseases at the post-border level to better target and coordinate resources.
- National surveillance plans need to be enacted for priority pests and diseases.
- The Commonwealth should have a proactive role in resolving significant post-border quarantine issues between states and territories, including domestic trade disputes.
- The Commonwealth should have greater leadership in several areas to reduce duplication of effort and ensure consistency:
 - Data collection and sharing, including development of surveillance applications
 - National plan for diagnostic capability
 - National research and extension priorities
 - Nationally consistent emergency response training
- National priorities and an implementation plan are needed for environmental biosecurity.
- National cost recovery principles should be considered along with exploring national funding models to implement the IGAB.

Introduction

The South Australian Government welcomes the Independent Review of the Intergovernmental Agreement on Biosecurity (IGAB).

Biosecurity is a fundamental issue for South Australia's primary industries, natural environments, public health and community amenity. Examples of key current biosecurity issues in SA include incursions of pests from interstate and overseas (e.g. fruit fly, Khapra beetle and Russian wheat aphid), national consistency in management of established animal diseases (e.g. Johne's disease in cattle and sheep), limiting further spread of non-eradicable pests (e.g. *Caulerpa taxifolia*, branched broomrape) and the introduction of new biological control agents (e.g. rabbit hemorrhagic disease, carp herpes virus).

Biosecurity is managed between three agencies in South Australia. Primary Industries and Regions South Australia (PIRSA), predominantly through the Biosecurity SA division, integrates state-level leadership on livestock and plant industries health, freshwater and marine (aquatic) pests, weeds and pest animals. PIRSA takes a partnership approach with the Department of Environment, Water and Natural Resources (DEWNR), which has the operational lead for weed and pest animal management (on behalf of the eight regional Natural Resources Management boards). DEWNR also has a state-level focus on wildlife health and biosecurity risks to native plants. The Department of Health leads on zoonotic diseases, such as mosquito borne viruses. PIRSA and SA Health share a role in food safety, with SA Health taking the lead under the *Food Act 2001*.

Preventing the introduction, establishment and spread of high impact pest and diseases is important in maintaining our state's premium food and wine industries and clean environment, to maintain productivity, market access and tourism. This whole of SA government response to the Review is structured around the general intent of the IGAB and specific issues relating to certain schedules.

General comments on the Intergovernmental Agreement on Biosecurity

- The IGAB has been an important national initiative and should continue to improve national biosecurity effectiveness, capacity and integrated systems. It is appropriate that it stays at the First Ministers level for signing and flags investment priorities to central agencies.
- The IGAB is broadly a principles document that gives a statement of intent on how the national biosecurity system should work. However, it is limited to describing government commitments and therefore has not substantially influenced industry or community stakeholders.
- To address industry and community commitments, a National Statement of Intent is needed, which would include clear definition of, and agreement to, shared responsibilities and specific roles. Industry and community reference forums should be used to develop this statement. Further, a national biosecurity strategy should be developed from this statement, to specify priority actions that governments, industries and the wider community will undertake.

- The new *Biosecurity Act 2015* will enforce onshore powers in all states from June 2016. South Australia acknowledge the shared responsibilities for biosecurity, including working closely with the Commonwealth when responding to biosecurity risks. This shared responsibility should be a key objective for all states/territories to be a signatory to the revised IGAB.
- The Commonwealth should be taking a much more pro-active role in national coordination of post-border biosecurity between states and territories, including leadership on resolving domestic trade disputes, and fostering national consistency in systems and targeting of resources. This will build national efficiencies in biosecurity systems and address weaknesses and bottlenecks that place jurisdictions at risk and can damage market access negotiations.
- There is a need for greater operational clarity of Commonwealth and state/territory roles and responsibilities for post-border interceptions that may necessitate state-led incursion responses. Timeliness is critical and the Commonwealth needs to recognise state capacity and expertise that are readily available. Regular communication between the Commonwealth and state/territory jurisdictions on biosecurity priorities is fundamental to operations at the local levels.

Schedule 2 – National decision-making and investment framework

- The IGAB has used improved risk assessment methods to foster investment in quarantine at Australia's international border. However, there remain inconsistencies in the risk assessment methods being applied among states and territories for post-border (on-shore) biosecurity. This has resulted in different approaches to the management of pests and diseases across borders.
- All biosecurity sectors should be working towards nationally consistent biosecurity risk, impact and benefit:cost analysis methods to prioritise pests and diseases that are established in Australia. For example, the National ESD Reporting Framework for Australian Fisheries is universally accepted by fisheries managers, environmental non-government organisations and commercial fishers as a method to manage the impacts of fisheries on economic, social and environmental values. Risk management systems have also been improved and widely adopted for weeds (linking to ISO 31000 Risk Management) and Animal Health Australia leads a risk prioritisation process with jurisdictions every two years to focus its AUSVETPLAN work commitments to emergency animal disease threats. The consistency of pest animal management would be improved if there was a consistent approach to pest prioritisation.
- Pressures that affect access to international markets are increasing and changing. To foster shared investment in prevention and mitigation measures, better communication and coordination are required on pest and diseases priorities at the border (Commonwealth) versus post-border (states and territories) levels.
- A revision of the schedule should include the development of national cost-recovery principles and explore national funding models to implement the IGAB.

Schedule 3 – National Biosecurity Information Framework

- Under the IGAB there has been major progress towards data sharing through drafting of standards and agreements through the NBC's National Biosecurity Information Governance Expert Group.
- However, investment in developing biosecurity systems needs governance because over the last decade funds have been wasted on systems that did not perform as expected or meet jurisdictional needs (e.g. Australian Biosecurity Information Network).
- States and organisations are developing surveillance apps without consideration of data compatibility with other states or the Commonwealth. National oversight, collaboration and convergence are needed in the development of surveillance and spatial apps in biosecurity.
- To enhance surveillance of emerging international threats the International Biosecurity Intelligence System (IBIS) model should be expanded across all biosecurity sectors.
- Data sharing across jurisdictions is still not a reality, despite having been agreed to by IGAB signatories. There appears to be some tardiness in operationalising this part of the agreement which must be addressed with some determination.

Schedule 4 – National surveillance and diagnostic system

- Surveillance technologies have advanced considerably. For example, the South Australian based Australian Testing Centre for Marine Pests is developing methods to detect DNA of marine pests in water samples.
- The IGAB has not led to national, cross-jurisdictional surveillance programs. Such programs are still typically state/territory led and vary in terms of the pests and diseases that are covered, spatial and temporal extent, active sampling versus passive surveillance and resourcing (e.g. FMD, Karnal bunt, citrus greening). Early detection is fundamental for biosecurity, because many pests and diseases are first recorded after they had spread to a level where eradication is not feasible. Cost sharing arrangements should be pursued for national surveillance programs that operate across state/territory borders. These surveillance programs should be based on national surveillance plans covering systems, methods and investment.
- Diagnostic services need national oversight to avoid duplication and identify where specialist diagnostic resources are needed. National agreement is needed on which state/territory will specialise in what biosecurity sector, with service level provisions to other jurisdictions (and provision for backup laboratories), to build a national capability plan. This national specialisation has now occurred in RD&E for some primary industries. A recent example is the NBC agreement for Queensland to maintain the national capability for tramp ant diagnostics, treatments and response plans. This is also the case with Hendra virus, but these examples are the exceptions not the rule.
- The lack of taxonomists remains a problem in many biosecurity areas, including environmental, wildlife and zoonotic diseases. A capability plan for specialist scientific services (e.g. entomology) would assist in ensuring these essential capabilities are maintained.

Schedule 5 – National Management framework for established pest and diseases

- The recently finalised Established Pests and Diseases of National Significance Framework, developed by NBC, has potential to guide government and industry investments in the management of established pests and diseases. The priorities outlined in this framework indicate that government expenditure on biosecurity would be expected to shift from established pests and diseases and be allocated to their prevention and early intervention. However, this may not result because there are competing political imperatives for investment in established pests and disease, which change the investment patterns in some jurisdictions and this puts pressure on other jurisdictions to increase funding in those areas.
- NBC's request for biosecurity sectors to develop their lists of established pests and diseases of national significance is strongly supported. National priorities for investment are a challenge, particularly where priorities differ between States/Territories. For example, the management of wild dogs, fruit fly, buffel grass, Johne's disease are high priorities in South Australia, but this varies amongst neighbouring states. Standardised risk assessment methods would assist consistent decision-making (refer Schedule 2 above).
- Cost benefit analysis of biosecurity investment is still difficult for environmental pests and diseases due to lack of data on their economic impact.

Schedule 6 – National engagement and communication framework

- Communications and engagement activities about biosecurity require investment consistency across states and across time to ensure that stakeholders understand biosecurity priorities. Community members also need to know how they can help, which is best conveyed using simple messages. An example from South Australia is high community and traveller awareness generated by the long standing Fruit Fly Freedom campaign, with urban reporting to the phone hotline critical for detecting new incursions.
- Biosecurity sectors need national communication and engagement plans with consistent messages to foster behaviour change in well-defined audiences. At a higher level, a National Biosecurity Statement (as discussed under General Comments) should develop messages on IGAB policy directions, which are appropriate for communications to industry, community and governments.
- In recent times, biosecurity engagement and communication by the Commonwealth has been too broad and not always strategically targeted. South Australia has established a coordinated and cooperative approach to biosecurity, working with local peak bodies; and the Commonwealth could benefit from utilising these arrangements.

Schedule 7 – National emergency preparedness and response arrangements

- There has been good progress since IGAB was implemented, particularly in animal emergency preparedness and response, and this needs to continue. There is a need for constant investment in preparedness, but this is inconsistent between jurisdictions and

biosecurity sectors due to differing structures and resourcing. Queensland, Western Australia and Victoria have recently increased investment in these areas following reviews of their priorities.

- NBC needs to avoid duplicating effort amongst subcommittees, including planning at both the biosecurity sector and jurisdictional levels, for what should be generic emergency responses based on the Australian Interagency Incident Management System (AIIMS). Training should be coordinated through NBC.
- Clarity and preparedness are required when switching legal powers between Commonwealth and States during different phases of responses. In agreed emergency situations, better sharing of skills and resources could be gained by cross-authorising State government staff to allow access to Commonwealth restricted access sites, such as ports of entry.
- Preparedness and response plans for environmental pests and diseases have not been developed to meet national standards.
- Some jurisdictions could not mount and sustain a Level 3 response for 48 hours without requiring assistance (NBC key performance indicator). The Commonwealth could improve their capability by increasing investment and training.

Schedule 8 – National biosecurity research, development and extension framework

- There is a critical role for research and innovation to support biosecurity policy, decision making, develop and deliver diagnostic protocols, undertake surveillance, and enable effective responses to incursions. Government agencies should be involved in all phases of biosecurity research projects that have policy or operational end uses.
- The national biosecurity RD&E strategies for animal industries, plant industries, and environment and community provide opportunities for coordination between jurisdictions and industries. These policy-driven strategies should be used to drive jurisdictional research specialisations (and hence reduce national duplication), and as a basis to coordinate extension services. Effective governance and national willingness to co-invest needs to be established to obtain significant benefits from the strategies' implementation. Participation is required from Commonwealth and state/territory agencies, research and development corporations, universities and other RD&E provider organisations.
- There are currently too many research projects that aim to improve diagnostic and surveillance methods. Research projects on new technologies, such as molecular and biosensor technologies, smart traps and sensor platforms, should include end-users to determine whether the research outputs could feasibly be adopted.
- More research investment is required to develop treatments to eradicate pests and diseases in biosecurity responses.

Environmental Biosecurity

- Environmental biosecurity has not had sufficient investment at any point of the biosecurity management spectrum (i.e. prevention, detection, response, ongoing management).

- The operationalisation of the National Environmental Biosecurity Response Agreement has not been adequately funded and there is a need to develop surveillance and incursions preparedness plans for high priority environmental pests and diseases. For example, national plans were not available when myrtle rust was detected.
- A revised IGAB should include national priorities for environmental biosecurity and the IGAB schedules should explicitly include actions required for this sector.
