



**Submission to the Australian Government
Department of Agriculture and Water Resources (DAWR)
with respect to the
Intergovernmental Agreement on Biosecurity (IGAB)**

Our Industry

The industry is comprised of four marine farming companies Tassal Group Ltd, Huon Aquaculture Group, Petuna Pty Ltd, and Van Diemen Aquaculture Pty Ltd. Marine farms are supplied with juvenile stock from several freshwater hatcheries, most of which are individually owned by one or other of the farming companies. In addition, there are numerous independent companies that directly support the industry, such as the Saltas hatchery, Snowy range hatchery and Targa hatchery. There is also a growing number of service companies that are part of the successful development of salmonid farming in Tasmania, including but not limited to, Skretting, Ridleys, Mitchells Plastic Welding, De Bruyn, Plastic Fabrications and SeaFarm.

The industry is fully vertically integrated. It both produces and purchases smolt (young salmon) for its diversified marine sites situated around Tasmania (geographic distribution mitigates environmental and disease risk). Fish are harvested in the main at Dover, in the lower Huon River and Macquarie Harbour prior to packaging and/or further processing at the specialist sites, Huonville, Margate, Devonport, and Parramatta Creek.

From an initial 56 tonne harvest in 1986-87, in 2015, the Tasmanian salmonid farming industry:

- produced in excess of 55,000 HOG (head on, gutted) tonnes of Atlantic salmon & ocean trout with a GVP of approximately \$650M;
- provided direct employment for 2,092, and indirect employment for a further 3,850, largely in rural areas;
- the industry's fish growing and processing operations are spread across most regions around the state, from south to north; and
- exported almost \$80M worth of premium salmon and ocean trout to countries all around the world.

The Tasmanian salmonid industry is now:

- the largest single "fishery" sector in Australia by GVP;
- by far the largest aquaculture sector in Australia;
- the largest primary production sector in Tasmania;
- larger than all other aquaculture and fishery sectors in Tasmania combined; and
- a significant contributor to the Australian and Tasmanian "food bowl" concept.

The Tasmanian Salmonid Growers Association (TSGA) is a not for profit organisation established by its grower members almost 30 years ago to represent the industry by working with federal and state Governments and their regulatory agencies.

The number one priority for the TSGA is the maintenance of freedom of disease and pest status in Tasmania as it relates to salmonids. Many of the serious diseases and pests of concern are exotic to Australia and potentially have major implications for aquaculture and fisheries across Australia. Tasmania's unique pest and disease status should be recognised and maintained as an absolute to ensure the ongoing viability of primary industry in Tasmania. As a region heavily reliant on primary industries and its clean green image, which not only underpins primary production, but other significant sectors such as tourism, the consequences of an exotic pest or disease incursion would have a far greater consequence on the Tasmanian economy than all other states.

Our regional freedom from certain pests and diseases has many fundamental implications for Tasmania including:

- Viability of the salmonid sector – certain exotic diseases and pests are likely to render the industry unviable. Increased market access in overseas markets.
- Significantly reduced antibiotic usage (currently negligible relative to comparable overseas salmonid farming regions such as Chile where antibiotic use is considerable).
- Reduced WHS risk due to reduced chemical usage.
- Brand enhancement for the “clean and green” image.

Our Submission

The Tasmanian Salmonid Growers Association (TSGA) welcomes the opportunity to comment on the review of the Intergovernmental Agreement on Biosecurity (IGAB). TSGA would also like to take this opportunity to again thank the Department of Agriculture and Water Resources (DAWR) for inviting TSGA to participate in the development of the *Biosecurity Bill 2015*.

Given the significant involvement of the TSGA in the development of the *Biosecurity Bill 2015* and the ongoing involvement in the IGAB review process, TSGA's submission will be in summary format.

Key Messages

Industry priorities and our 'duty of care'

- The Tasmanian Salmonid Growers Association (TSGA) believes the IGAB is a proactive and cooperative approach to the management of Biosecurity for Australia, and therefore should be strongly supported.
- In order of importance, the following are the TSGA's most significant biosecurity risks and priorities for Australia:
 1. Appropriate protection of pathways to entry – horizon scanning to compile and rank list of potentially invasive species.
 2. Evolution/expansion of first points of entry management – increased monitoring and surveillance
 3. Giving biosecurity prime importance when considering trade related matters

4. Ensuring we do not put at risk the long term future of our primary industries for short term economic/political gains
 5. Climate change – rapidly changing range of current/potential pests and diseases.
 6. Adequate resourcing of monitoring/response activities.
- The salmonid industry recognises its shared obligation to mitigate against the establishment, spread, and impact of aquatic pests and diseases. It is matter of fact that mandatory and voluntary biosecurity measures already implemented by most aquaculture enterprises against risk from pathogens entrain a co-lateral benefit with respect to marine pest management. The industry also recognises that despite best efforts, and world best practices, outbreaks of known or novel endemic pests and diseases can occur. In other words, the industry itself cannot insure against all risks.

Strategic partnerships are the key to success

- The TSGA views the IGAB as an ‘agreement between partners’, not a tool of the Commonwealth to control domestic and international biosecurity.
- Our industry could become a champion of the IGAB; however industry needs to be engaged, connected, and aligned.
- Many commercial, recreational and community groups/individuals already partner the Tasmanian state government in managing and controlling biosecurity. This contribution should be recognised and the strategy should further enhancing and establishing these partnerships.
- The TSGA would like to see more emphasis in the IGAB given to interdepartmental and intergovernmental partnerships and communications in relation to Biosecurity.
- Furthermore, the development of a formal alliance between industry, DAWR and the state Government should be considered as a key pillar in the establishment of collaborative partnerships. This initiative should then be recognised within the strategy.

Decision making methodologies

- The TSGA recognises that the Tasmanian state government has not signed the IGAB due to concerns with section 7, subsection 7.19- *Interstate Trade*. The TSGA supports this position and requests that the section is redeveloped to accept that a state retains the right to make and defend its own decisions.
- The TSGA strongly believes that any decision process must be transparent and independent and must be based on good scientific evidence and debate.
- The decision making process must also determine whether stakeholder advice has been fully considered and taken into account in the task of import risk analysis—a role that keeps the Department ‘honest’ in its dealings with stakeholders.

Understanding the IGAB

- The TSGA believes that if the industry better understands the expectations of IGAB than it will be better placed to develop and implement its own systems to meet IGAB objectives.
- Whilst it is recognised that the Biosecurity Strategy does need to be a high level document it does currently presents itself as a relatively technical and detailed publication and to an extent will therefore disengage the general public, average primary producer and

recreational user. At the moment the Biosecurity Strategy reads as a “government” document and potentially fails to invite other stakeholders along for the journey.

- For the strategy to be successful it needs to convey the key messages in clear and simple images and explain to stakeholders the relevance of the strategy to them and their industry/business/hobby.
- Alternatively TSGA would like to see a secondary document in summarised format produced for the general audience with an appropriate communications plan to disseminate the relevant information.
- Given the IGAB’s commitment to fostering stronger partnerships it is important that the area of communications is strengthened. It is important that all the community is reached in the strategy and also those visitors to Australia.
- Governments and industry organisations can strengthen the involvement of industry and community stakeholders in Australia’s national biosecurity system by taking advantage of broader industry knowledge, experience and expertise. There also needs to be focussed, harmonised and pro-active biosecurity planning at national, industry and enterprise level.

Investing in Biosecurity

- The IGAB investment principles still meet the needs of Australia’s national biosecurity system (**Note:** the increase in Tasmanian government investment in biosecurity at recent budget 2016), however, throughout the IGAB document there is a regularly recurring rider “subject to available resources and parliamentary processes”. The TSGA believe there is a need to strengthen political and resource commitment to the IGAB.
- The TSGA strongly believes that investment in biosecurity activities can be better targeted. A contemporary funding strategy is required and at its core is a shift from reactive to proactive biosecurity management. The TSGA’s Biosecurity Program (2014) is an industry aligned biosecurity strategy which recognises that investing in preventative measures is far more effective than investing large resources on reactive plans.
- Ensuring an equitable level of investment from all stakeholders across Australia’s national biosecurity system will be paramount to the success of the IGAB. However the industry is strongly of the view that in the specific case of an outbreak of a pest or disease which is proven to be caused by an exotic strain of that organism, the Government should not be entitled to seek cost-recovery from the very sector which has been impacted by the outbreak through no fault of its own. Rather Government, which has the sole responsibility of regulating importation of product or material which may carry a biosecurity risk, should recognise that it is itself the risk creator. In such a case application of the “beneficiary pays” principle would be a perverse outcome against natural justice; seeking cost recovery from the “beneficiary” would be tantamount to seeking cost recovery from the victim.
- TSGA believes it would be negligent to omit the challenges governments face in ensuring adequate financial resources are allocated to quarantine and biosecurity and how some of these resource challenges may be managed into the future.

Response times are critical

- Recognition of the necessity to have appropriate emergency response strategies is detailed in the strategy however TSGA wishes to reiterate that in the event of a pest incursion a

response plan must be capable of being activated quickly. “An appropriate response capability” does not adequately address the necessity to respond to any incursion rapidly. It is vital that any response is rapid in the first instance, with a down grade in response in the second instance (if that is appropriate action) rather than an “appropriate” response in the first instance which may end up being too slow.

- The timing of a response can be the difference between eradication, control or loss of area freedom.

Market access and biosecurity

- With regard to market access and biosecurity, it is our strong submission that there is an inherent conflict, either potential or perceived. *Beale report (2008)* recommended establishment of an independent biosecurity authority – the TSGA would like to know if this concept is still being considered.
- TSGA queries the use of terminology “**least trade restrictive**”.
- Growth in the volume and complexity of international trade, combined with the liberalisation of regulatory regimes to encourage trade, has increased the frequency of introductions along existing pathways, the number of new pathways, and the ease with which potentially invasive species can move along those pathways.
- Unfortunately Australia is facing a significant increase in introduction pathways (e.g. international container import volumes are expected to triple between 2010 – 2030) coupled with declining or static allocation of resources to the Department of Agriculture and Water Resources. Therefore we ask that the surveillance systems (including diagnostic systems) underpinning Australia’s national biosecurity system be adequately resourced and properly supported.

Expenditure on Biosecurity, Export Services, and Plant and Animal Health

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19
	Actual (m)	Actual (m)	Actual (m)	Actual (m)	Budget (m)	estimate	estimate	estimate
2.1 Quarantine & Export Services	552.5	536.3	548.2	559.4	606.0	601.0	599.0	590.0
2.2 Plant and Animal Health	53.6	55.8	58.9	61.5	incl above	incl above	incl above	incl above
Total Staffing	3721	3718	3599	3460	3659			

- Whilst TSGA support a consistent approach to survey and surveillance activities, the approach adopted should ensure that these practices meet international best practice to ensure that market access is not compromised due to con-compliant data aggregation.

Addressing the Research and innovation gap

- Australia’s national biosecurity system requires significant investment into research and innovation in identifying and managing pathways of entry. The best way to achieve this is by coordinating biosecurity-related research and innovation activities through increased support and funding of the *Centre of Excellence for Biosecurity Risk Analysis and Research* or an industry driven CRC/RDC that is focussed on biosecurity.
- TSGA would like to see a dedicated Biosecurity RD&E strategy. The strategy would address such issues as treatments, control measures and the changing of pest dynamics through

climate change. Whilst industry is addressing some of these issues it is yet another area where greater collaboration could result in more meaningful and targeted outcomes.

Measuring success

- It does need to be stated that **zero risk is possible**. However TSGA recognises that achieving zero risk can potentially be impractical and expensive but due consideration should be given to the point where emphasis moves from zero risk to an acceptable level of a very low risk. Zero risk should however remain the goal.
- Success of the IGAB could best be defined and measured as- ***no imports of diseased products AND no new pest or disease introductions.***

In Summary

Biosecurity can be a complex and challenging activity for governments, industry and the community. However, the TSGA strongly believes that there is desire by both industry and government to *'get this right'*.

It must be 'our' shared goal to ultimately protect and embrace Australia's biosecurity status for the benefit of our primary industries, environment and public wellbeing, health, amenity and safety.

We strongly urge the Department to maintain purposeful engagement and consultation with stakeholders and set appropriate time frames for review and consideration.

The TSGA and its members are available to provide professional, informed advice and testimony to the Committee; and we would be happy to do so again as required.

Yours sincerely,



Dr Adam Main
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Tasmanian Salmonid Growers Association Ltd (TSGA)