



Submission to:

Intergovernmental Agreement on Biosecurity

An Agreement between the Commonwealth of Australia,
State and Territory Governments to strengthen the national
biosecurity system

Response to the IGAB Review Panel's Discussion Paper

8th July 2016

Introduction

The Western Australian Farmers Federation Inc. (WAFarmers) is the State's largest and most influential rural advocacy and service organisation. Founded in 1912, WAFarmers boasts a membership of over 3,300 farmers including grain growers, meat and wool producers, horticulturalists, dairy farmers, commercial egg producers and beekeepers. Collectively our members are major contributors to the \$5.5 billion gross value of production that agriculture in its various forms contributes annually to Western Australia's economy. Additionally, through differing forms of land tenure, our members own, control and capably manage many millions of hectares of the State's land mass and as such are responsible for maintaining the productive capacity and environmental wellbeing of that land and the animals that graze it.

WAFarmers welcomes the opportunity to submit a response to this important review process and endorses the submission provided by Cattle Council of Australia (CCA).

The IGAB

1. **Is the IGAB a suitable mechanism to underpin Australia's national biosecurity system in the future (10 or 20 years from now)? Are the consolidated priority areas still appropriate?**

Australia has acquired a considerable reputation for its biosecurity management and enforcement systems and the initial IGAB was supported as an important step towards formalising cooperation between all entities. However, we still have some way to go to resolve a number of issues, especially the acknowledgement by government personnel of the role and expertise industry representatives can bring to the biosecurity system.

A challenge still to be overcome relates to how governments can get beyond their current fragmented approach to biosecurity? Australia still has multiple agencies across the biosecurity spectrum responsible for a range of plant, animal and human threats. Much work has been done on reforming different parts of the biosecurity continuum, yet less on how to integrate these reforms more effectively to produce holistic biosecurity strategies in full collaboration with industry entities.

Recent epidemics such as the Hendra virus and avian influenza are examples of zoonotic diseases that can only be effectively dealt with if scientists and industry working across different components of the biosecurity spectrum collaborate on mutually understood national biosecurity principles. In general, there needs to be a much stronger link to establishing biosecurity goals with industry stakeholders.

The setting of biosecurity priorities will require an integrated approach across different contexts, including some areas that may have previously not been thought of as relevant to national security, policing and defence. A more integrated role by industry, epidemiologists, biologists and other public health experts in national biosecurity analysis and investigation will help to increase the accuracy or current calibration of biosecurity threats. Scientists can do this by helping to combine scientific disease modelling, biotechnology and biomedicine together with policing intelligence methodologies such as target profiling of high risk offenders. For example, are the key biosecurity threats more likely to come from human transmission, zoonotic transmission, or via the environment, and what more can be done to assess their likelihood and capability using an amalgamated biosecurity approach.

Enhanced levels of biosecurity expertise embedded with national security and policing intelligence agencies will be increasingly important in developing a more strategic approach in the biosecurity context.

The IGAB has served to strengthen the concept of shared responsibility, but has overlooked the role of industry. The CCA referenced the fact that the National Biosecurity Committee (NBC) has involved only two (the federal and jurisdictional governments) of the three components necessary for Australia's reputation to remain relatively intact.

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

The IGAB brought together the multitude of government agencies to encourage collaboration with policy direction, but it is now time to reach further involvement with industry entities including state farming organisations, more formally. Such an approach would complement joint initiatives with AHA and PHA, Safemeat, R&D and export marketing groups. Consideration needs to be given to providing sufficient resources to industry entities to allow for meaningful input.

There needs to be a formal interpretation of what represents constructive, open and transparent consultation between all parties. Governments need to understand that there are consequences to decisions to step back and transfer responsibilities to industry.

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?

As proposed in the CCA submission, AHC and AHAIF provide useful structures for industry/government interfaces, but industries potential involvement in the IGAB has been underutilised particularly in the context of shared responsibilities. The National Biosecurity Committee should consider adopting the same structures.

An existing service which is not being utilised within current biosecurity structures is local council officers who are responsible for emergency response plan actions on the ground. WAFarmers would encourage the inclusion of these officers in the decision making process.

Agreeing to risks, priorities and objectives

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

WAFarmers supports the proposed goal and objectives and believes them to be appropriate to meet future aspirations.

In its 2014 report, Australia's Biosecurity Future: preparing for future biological challenges, the CSIRO identifies a number of global trends that will result in significant change and increased complexity of biosecurity challenges for Australia in the future. This includes trends relating to agricultural expansion and intensification, urbanisation and changing consumer expectations, global trade and travel, biodiversity pressures, and declining government resources. The report highlights that the intersection of these trends could lead to a future situation where existing biosecurity processes and practices are not sufficient (CSIRO 2014).

Identifying current and future biosecurity risks and priorities is only half of the equation. In an environment with constrained and finite resources there is a fundamental need to ensure that every dollar invested in biosecurity yields the greatest return possible. The ordering of risks and priorities, and undertaking biosecurity activities in a strategic and coordinated way is essential to achieving maximum return on investment.

Integral to the system is an intelligent and truly collaborative risk management approach. The approach needs to support recommendations made by the Gorrie Review (2004) that argues that 'a "zero risk" system is unachievable' and the Beale Review that "the balance and level of biosecurity resources across the continuum should be determined by a consistent analysis of risks and returns across programs". The risk management approach targets resources to where they will have the greatest impact.

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?

As referenced in the Red Meat Industry Strategic Plan, biosecurity is a high priority for the industry in minimising the impacts of emergency and endemic diseases and has the highest cost/benefit ratio of all expenditure items. Foot and Mouth Disease pose the greatest threat not only to the Australian livestock industry but to the economy as a whole. A number of scenarios have been completed to test our ability to rapidly respond to an incursion. At a recent biosecurity preparedness and response exercise, referred to as Apollo reinforced the lack of acknowledgement and understanding of the role industry representatives can offer government personnel in such a crisis and therefore we question whether the current objectives are being met.

As suggested by CCA, the National Animal Health and Diagnostics Surveillance Program, which is in its formative stages, will help address some of these shortcomings, assuming it is successful in improving awareness among those potentially able to contribute. It is also important for producers' time being recognised as their 'contribution-in-kind' at the very least.

The livestock industry itself has done much to improve its preparedness but, again, more is needed. While emergency funding is accommodated (through the current zero-rated levy, which can be triggered by the Federal Government if necessary), recurrent funding for industry's biosecurity initiatives is nearing crisis point.

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?

We don't believe the components and functions of the national biosecurity system are consistently understood by industry stakeholders and to some extent government personnel, as was evident at the recent Apollo exercise and the example we have provided in appendix one below. When comparing the biosecurity models adopted by other countries more adept at managing emergency animal diseases, Australia has developed a complex model of components and functions which is prone to cause confusion and inhibit effective engagement.

A rationalisation of the model components would be beneficial for all concerned.

As an example and as a consequence of the recent introduction of the national Biosecurity Act, it became evident that no formal reporting mechanism had been implemented between Australian Quarantine (ex-AQIS) inspectors and State Inspectors to enforce WA Biosecurity import regulations. The State inspectors (WAQIS) have informal notification networks, which would allow them to inspect an object to ensure compliance to WA import regulations. However, the national Biosecurity Act did not identify a formal obligation process to allow AQIS inspectors to notify WAQIS. WAFarmers preference is for BICOM to allow for regional freedoms, and include State specific restrictions.

Federal governments must respect and accept State areas of freedom in the national decision making process.

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?

Government leadership and willingness to work in partnership with industry is hugely beneficial and cost effective, particularly given rapidly reducing resources. The impediment has been bureaucratic obligations and cultural environments are prohibiting the partnership from flourishing by holding back from involvement and by not acknowledging industry contributions.

A major concern is the transitioning of government duties to industry entities without adequate resourcing or funding support, but reluctance by government personnel to recognise and accept this changed dynamic.

A resolution to this situation will only be achieved when a truly integrated industry/government approach is taken and funding shortfalls are addressed.

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?

As mentioned in question one, by combining with other government and private departments in a more coordinated approach, a stronger and better resourced biosecurity system will evolve. All who benefit from our biosecurity status including the public and international visitors, should share in the resourcing and management of the biosecurity system.

Greater clarity is needed on the roles and responsibilities of interested parties in the development and deployment of implementation plans. Awareness building of the roles and responsibilities could be achieved through the use of frequent webinars and regional biosecurity groups. In Western Australia, WAFarmers hosts practical workshops around the state in collaboration with DAFWA employees and commercial industry partners to increase the awareness of biosecurity (prevention and response) plans. The workshops allow participants to actively engage in the decision making process with the outcomes delivered back to state based biosecurity committees.

Embedding shared responsibility

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

We don't believe so, as mentioned above. There is a vast difference between the biosecurity aspirations for an individual business as compared to the requirements and obligations of a national biosecurity system. A weakness in the understanding lies in the evolutionary development of the system, which is further hampered by the increasing workloads of individuals who would like to commitment more time to the process.

Confusion is further exasperated by the fragmented biosecurity systems and programs adopted by state and national jurisdictions. On the whole in WA, producers and growers are contributing funding up to six times¹ towards biosecurity programs without having clear understanding of how this money is being spent on the ground, whether outcomes are being achieved or analysis of budgetary breakdowns. Although producers are major contributors to the funding of a variety of biosecurity programs there is little provision provided to them to input into the decision making process. Webinars, concise reporting mechanisms and collaborative workshops and engagement with existing SFO councils and regional committees would assist this engagement process. We must aim to utilise existing structures and avoid creating more structures and meetings.

1: Statutory R&D Levy (Plant Health Australia (PHA)/Animal Health Australia (AHA)), Regional Biosecurity Group (RBD)/Declared Species Groups (DSG) levy, land services/Shire rates, Industry Funding Schemes (IFS) levies, contribution to Treasury through tax, funding contributions through lease arrangements

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 increase involvement in decision making on and implementation of biosecurity activities help the adoption of shared responsibility?

An example, which is working well in some states, is the formation of a partnership involving all parties, who via a committee structure agree the priorities and risk management pathways for specific issues. Each representative then takes on the auditing, monitoring and reporting obligations as part of shared [cost] responsibilities. For example, government extension officers completed field monitoring for a pest/disease. This duty could be done by industry field officers as part of the daily obligations in the field at an agreed hourly rate of employment to complete the service on behalf of the government. For this concept to be successful, everyone has to be involved in the decision making process on an equal footing and understand and agree to their formal obligations.

The future aim must focus on optimising and restructuring existing state and national systems to achieve a truly united, collaborative, well-resourced and cost efficient biosecurity plan for the betterment of the Australian agricultural industry and wider economy. At present considerable funds and resources are being wasted because of duplication, excessive core operational cost structures and silo building concepts. There needs to be greater emphasis placed on developing trustful partnerships under the cost and responsibility sharing arrangements.

Funding biosecurity

11. Are the IGAB investment principles still workable? Do they still meet the needs of Australia's national biosecurity system now and in the future?

WAFarmers agrees the principles are still workable but funding contributions and resources will have to be optimised to achieve the desired beneficial outcomes for the country.

It should be noted that producers have picked up the responsibility and funding for endemic disease controls including some modifiable diseases like Johnes disease in sheep and cattle, footrot in sheep, declared plants controls like skeleton weed and so forth and therefore this cost saving should permit governments to reallocate funds towards the biosecurity management obligations needed for emergency category diseases. It should be noted that approximately \$80m has been withdrawn from biosecurity services such as Biosecurity Australian (ex-AQIS) and other cost cutting priorities but income generated in other areas have not been accounted for as part of budgetary realignments and responsibilities.

For example in Western Australia, livestock producers and arable growers contribute levy funds towards commodity (sheep, cattle, grain, etc.) priority declared pests, diseases and weed control management programs, with a percentage of the funding used to employ departmental staff.

These same producers and growers are also contributing further funds (on top of the commodity based levy contribution noted above, which is managed by industry funding scheme committees) to regional biosecurity group priorities and activities, which are match funded by the government. Often Western Australian biosecurity priorities can be quite different to those in the eastern states.

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.

Responses to these questions have been noted above.

WAFarmers believes the Federal government goals and objectives for biosecurity investment is correct, but suggests national policies and systems must be integrated with state obligations and formal reporting procedures must be developed and observed to form a united and transparent system.

The industry does not need another biosecurity levy. What is needed is a review to realign and consolidate current biosecurity plans and programs to maximise limited resources and funds to achieve the best possible outcomes long term. Consideration could be given to a passenger entry tax to raise income for biosecurity purposes. Biosecurity is after all an obligation that must be met by all parties.

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

Targeted consultation with both state based government personnel and key industry representatives is fundamental to ensure a solid return on investment for all parties concerned. And, importantly a united, all-inclusive consultative process completed in a timely manner will ensure priority alignment and a flexible approach to risk mitigation programs.

The example given in question 6 was only identified by the industry at a very late stage of the implementation process and caused considerable anguish for the industry. This was a direct result of a poor consultation processes between public and private (industry stakeholders) entities.

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?

No. Shared cost and responsibility sharing in the future will have to involve many public (government departments) and private entities to ensure adequate funding and resources are available to meet future risks, particularly given changes as a consequence of climate change and global population movement trends. The importance of the agriculture sector appears to have diminished in the eyes of the Treasury as millions is poured in public health and education regardless of the fact that all sectors are intimately linked in terms of biosecurity management and controls.

WAFarmers is proposing the rational needs to change to allow for a collective distribution of funds and resources aimed at determining Australia's true biosecurity priorities and funding needs.

Greater unity and alignment of the funds collected for biosecurity systems both at state and national levels is urgently needed.

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?

In essence, the Generalised (or Biological) Invasion Curve created by the NBC has been accepted by NFF and Cattle Council as a logical base for discussions around responsibilities and funding. Governments have a far more effective role to play on the left end of the curve and landholders (which include governments in some circumstances) more on the right.

In determining beneficiaries, NFF added one concept important to the 'funding equation': the recognition that industry (rather than the community as a whole) may be the beneficiary from a program that might otherwise be beyond the capacity for private funding because of market-failure principles applying; this would give justification for levy funds (as against taxes or private moneys) being employed.

Regarding risk creators, NFF urged discussion around the need for a punitive approach for risk creators who either unnecessarily cause the spread of unwanted pests, diseases or weeds or inhibit the management of them through lack of care or engagement, and whether special attention to 'fringe groups' and/or multi-land users is needed in developing management and control strategies at the regional level.

Monitoring and surveillance is maximised at key port and border locations but an analysis of risk creators could prove that their presence is found at remote port/border locations. Industry experts

stationed at remote ports could be employed to fulfil the monitoring and surveillance requirements on behalf of the government.

Market access

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

As stated by CCA, Australia has to play a careful balancing act between protecting our own industries and communities from incursions and pressing for access to foreign markets for our exports on which we rely so heavily. Cattle Council contends that Government meets this challenge well. This is probably reflected in the criticism from foreign governments that the Australian Government is too close to industry when determining its trade policies and criticism from Australian industries that it can be too aligned with its international obligations for Australia's long-term good.

On the latter (industry's opinion), a greater integration of industry into biosecurity-related policy making can improve the level of understanding and engagement by industry in relation to international trade imperatives and the balancing act required of Government. This is not to discount Australia's priority to keep unwanted organisms out where possible.

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?

Industry contends that governments could and should play a greater role in supporting industry-driven biosecurity programs.

As discussed above, governments, particularly at jurisdictional level where interface with industry is pronounced, have moved further and further away from direct involvement in, for example, endemic-disease management and extension services. Industry has accepted this as an unwelcome reality and has recognised the cost savings this has delivered to these governments at industry's expense. In return, industry has made requests for greater regulatory backing (where appropriate) to assist with the implementation of, and compliance with, its disease-management and quality-assurance programs.

The perception that jurisdictional governments continue to take and not give is raising unnecessary animosity from industry; a more co-operative approach would benefit Australia's biosecurity efforts overall, with very little added costs.

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

WAFarmers is concerned that recognised diagnostic bodies and their structures have been abolished by government, which in turn has effectively hampered the adoption of innovative and novel approaches to disease and pest controls. The APVMA for example, are incredibly slow and complacent in their obligations to approve new ag vet chemicals.

Effective surveillance and diagnosis processes need to be in place with high industry ownership. This should be guided, in the first instance, by a gap analysis of industry/government funding mechanisms for surveillance, compensation and technology.

These need to include processes for:

- Improved detection of endemic species which could switch to pest status (e.g. Myrtle rust).
- Monitoring of WA crops for new weeds and stored grain insects through the use of image analysis equipment, and
- Improved options for insect protection in storage.

The role of research and innovation

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

There are two regional infrastructure opportunities identified by the WA grains industry for action over the next decade to improve the efficiency of the production sector of the WA grains industry.

a) Radar coverage

Current radar coverage of WA has been improved with the provision of 3 additional Doppler radar sites, which will likely significantly improve rainfall and wind information throughout the entire grain belt. When combined with the existing network of Automatic Weather Stations, and the development of the network further, the additional radar coverage would provide both accurate rainfall and wind data across the region as well as important predictive real-time information on impending, potentially dangerous, weather events. The more detailed data would offer farm businesses with climatic data at a much finer level of detail across their entire land holdings, enabling them to gauge chemical spraying, fertiliser application, seeding and harvesting operations with more efficacy and help to maximise production efficiency.

b) Communications infrastructure

There is a need for the provision of comprehensive data connection services throughout the grain belt, more than likely utilising wireless transmission technology connected to optic fibre in regional centres. Data access is required currently for day-to-day business operation such as banking, communications, machine surveillance and weather updates. Further improvements in data speed would facilitate benefits of telemetry and automation of plant and equipment for precision agriculture as well as provide the opportunity for the real time transfer of data from the field. Data access is mandatory in urban businesses and long-term farm business efficiency will hinge on this improvement of services in rural WA. Future opportunities also exist for biosecurity surveillance and product assurance purposes.

For the livestock sector, the National Animal Biosecurity RD&E Strategy was established to deal with these questions. If progress in these areas is inadequate, perhaps the Strategy and its management structure require review.

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

We propose as an example, an Australian Animal Industries Research Centre could be established broadly on the principles that have made Institutions such as the Telethon Kids Institute and the Harry Perkins Institute so successful in Western Australia. The model we envisage would include many of the concepts under which the Cooperative Research Centres operate although this new centre would be without the high overheads of a completely new structure. If structured in this way it could make the collective of researchers and industry more able to respond quickly to change and emerging opportunities in technology and markets.

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

As noted above.

Measuring the performance of the national biosecurity system

22. What does success of Australia's national biosecurity system look like? How could success be defined, and appropriately measured (that is, qualitatively or quantitatively)? What, if any, measures of success are in use?

Measures of success will differ across the biosecurity continuum. The only given is that baseline data and success measures or key performance indicators and milestone outcomes, are necessary to gauge progress. One of the tasks must be to devise such measures.

There are a number of options available to determine the success of biosecurity activities, including levels of surveillance, or conducting models of the biosecurity system to ensure all areas are adequately protected as required.

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?

One of the objectives of the National Animal Health Surveillance and Diagnostics Program Business Plan is to enhance the collection, management and effective use of animal health surveillance information. With \$200m allocated by the Federal Government in 2015 to improve biosecurity surveillance in Australia, data collection and analysis methods must form an important part of Australia's future biosecurity strategy and hence expenditure. A concept strongly supported by WAFarmers.

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

There is also an issue with accessing and integrating the multiple sources of data, and in evaluating the value of the rapid proliferation of computer-based tools and Applications offered to grain and livestock producers. There is a need for an independent analysis on the value of these tools and how to integrate the technologies to enable producers to make best use of their own data and these management support tools. A precursor to making significant progress would be the development and adoption of an open data exchange system to harness and combine the range of farm data with weather, financial and technical information.

The creation of commodity based risk assessment pathways should help to deal with known and unknown pests and diseases. This approach will help to ensure inspections deliver the greatest level of protection in a cost effective manner. A risk register would help to identify and prioritise evidence needs and this information should feed into research programmes.

The Disaster Resilience Planning for Australian Agriculture Project will improve the preparedness of the agricultural sector in facing disasters and will result in improved business continuity in the aftermath of disaster, enhanced operational sustainability of farms and other agri-businesses which are an integral part of Australia's regional economies and improved resilience to rebound from disasters and adapt to the post-disaster environment.

A Resilience Model Plan provides guidance as to how to manage a disaster through the life cycle of preparation, recovery and response at a regional and national level. The model is grounded in the need for systematic and proactive planning to minimise impact, rather than a reactive response. Its success relies on a quick, successful return to business after an event. Crucially, government and industry collectively assess hazards and risk information when making decisions.

In Summary

The significance of effective partnerships and stakeholder engagement has become increasingly important over the last five years as the complexity of biosecurity systems increases and the effectiveness of maintaining a biosecurity environment rests with co-operative and well-resourced approaches to biosecurity activities.

Appendix One: An example, to indicate the issues experienced by the industry during the consultative process for a specific biosecurity incursion.

Following the detection of Russian Wheat Aphid in South Australia and Victoria, DAFWA is developing a combined industry and government response plan.

DAFWA have developed a number of incursion scenarios for review by GrainGuard, a committee of industry and DAFWA representatives.

However, members of GrainGuard are not able to discuss the scenarios with their respective organisations, and have provided limited opportunity for GrainGuard to be involved in the response plan developed.

The below is a response to the provided scenarios, and the initial concerns identified with the consultation process offered by DAFWA.

While the scenario development is an important first step, it does not provide any further information about the response plan that will be implemented. While DAFWA have developed an outline of multiple potential scenarios of incursion of RWA into WA, the most likely scenario is RWA detected on a farm.

WAFarmers is of the opinion that once RWA is detected, it will most likely be further beyond the immediate area as specified in the actions, therefore triggering the review of response activities (the response plan). Therefore, the actions specified may be unrealistic of how an incursion will occur, and how rapidly it will spread.

There is also concern that there is limited information about what the industry and government response plan is.

DAFWA are proposing a joint funding venture, however there has been limited consultation with industry. At this stage, it appears that DAFWA are developing a response plan on behalf of industry, while expecting joint funding to be provided, with limited input from industry.

WAFarmers considers it vital that a number of options for the response plan, should be distributed to the wider WA agriculture community to ensure that DAFWA have a plan in place that is supported by, and developed in conjunction with industry. It would need to be realistic about costs, economic threshold calculations, as well as clear definitions and expectations from both industry and DAFWA.

As a member of GrainGuard on behalf of WAFarmers, it is frustrating that I do not have the opportunity to discuss this with my executive, Grains Council representatives, or our membership.