

6 March 2017

IGAB Review Panel  
Dr Wendy Craik AM (Chair)  
Mr David Palmer  
Dr Richard Sheldrake AM

Email: [igabreview@agriculture.gov.au](mailto:igabreview@agriculture.gov.au)

Dear IGAB Review Panel

Please find attached Animal Health Australia's (AHA) submission to the Intergovernmental Agreement on Biosecurity Review Draft Report.

AHA would like to congratulate the Panel for generating a report that endeavours to provide clarity around Australia's complex biosecurity system.

The report contains valuable information and, importantly, focuses on the adoption of a systematic approach to determining and planning for animal, plant and environmental pests and diseases. We make particular note of *Figure 1: Recent activity in Australia's biosecurity system* featured on page 4 of the report. This excellent infographic provides useful data for now and into the future.

If you would like clarification on any points within our submission, please do not hesitate to contact me.

AHA looks forward to seeing the final report and working with the Commonwealth, jurisdictions and industry to strengthen Australia's biosecurity system.

Yours sincerely



Kathleen Plowman  
**Chief Executive Officer**



# IGAB REVIEW DRAFT REPORT

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ANIMAL HEALTH AUSTRALIA SUBMISSION

## **ABOUT ANIMAL HEALTH AUSTRALIA**

Animal Health Australia (AHA) is a not for profit company that fosters an innovative partnership involving the Australian government, state and territory governments, major terrestrial livestock industries, and other stakeholders. AHA works with its members and stakeholders to strengthen and improve Australia's national animal health and biosecurity system to ensure it delivers competitive advantage and facilitates market access by maximising confidence in the safety and quality of Australia's livestock products in domestic and overseas markets. In a joint effort with and through our members, we:

- help keep Australia free of the major livestock diseases that are exotic to Australia
- build the sustainability of our livestock industries
- build capacity to enhance emergency animal disease (EAD) preparedness and response
- ensure Australia's livestock health systems support productivity, competitive advantages and preferred market access
- contribute to the protection of human health, the environment and recreational activities.

By working together we achieve a more effective sharing of available and finite resources.

## EXECUTIVE SUMMARY

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Animal Health Australia (AHA) welcomes the opportunity to respond to the draft report on the review of the Intergovernmental Agreement on Biosecurity (IGAB). AHA's submission gives consideration and provides comments on feedback requests and specific recommendations to the system wide improvements suggested in the report, where appropriate, and in particular those recommendations that concern AHA directly.

### *Knowing and owning our roles and responsibilities*

*Feedback request 1: The Review Panel seeks feedback on the draft roles and responsibilities of national biosecurity system participants.*

AHA is not adequately represented in the proposed roles and responsibilities of the national biosecurity system participants and this needs to be corrected. AHA does far more in collaboration with our government and industry members than is outlined.

*Recommendation 1: The NBC and the proposed Industry and Community Advisory Committee, through an open, transparent and collaborative process, should lead the development of a draft National Statement of Intent for public consultation...*

AHA strongly supports the development of a National Statement of Intent as an overarching national policy document, to provide greater clarity to biosecurity participants. AHA sees the collective development of a National Statement of Intent as an important stepping stone to the eventual development of a national strategy, which would improve coordination, collaboration and biosecurity investment by setting the national strategic directions for all stakeholders over the long term and binding all to the expected outcomes through a genuine and transparent shared responsibility approach.

AHA agrees that the National Statement of Intent must be developed jointly and agreed by all major participants – government, industry and key community representatives. 'Shared responsibility' and 'biosecurity' are terms that have little meaning to the everyday person despite their utmost importance to their own and society's wellbeing. Instead we should be emphasizing that every Australian has a part to play in our biosecurity system and that everyone benefits from it. Additionally, if we are to strengthen environmental biosecurity, the definition of the 'environment' needs to be clarified to ensure all stakeholders are on the same page and to manage future expectations, communications and partnerships.

### *Market access is key*

*Recommendation 2: The Primary Industries Technical Market Access and Trade Development Task Group should seek to enhance engagement with industry.... AND*

*Recommendation 3: IGAB2 should strengthen consideration of market access requirements with the next NBC work program. AND*

*Recommendation 4: Jurisdictions' biosecurity surveillance activities should include pests and diseases that pose the greatest threat to our export markets.*

It is AHA's view that the NSW Government Department of Primary Industries submission proposes a sensible approach to strengthening market access priorities and outcomes within the national biosecurity system.

The development of a national priority disease list for livestock will be beneficial to ensuring we manage exotic and endemic disease incidents in a more structured way. However while trade is an important consideration, a broader approach should be applied; biosecurity is about more than market access. The development of a national priority list should also take into account those diseases that also have a significant impact on productivity (and, as a result, indirectly impact market supply, Australia's reputation and/or ability to maintain market share).

### *Stronger environmental biosecurity*

*Recommendation 8: Jurisdictions should institute formal arrangements between agriculture and environment agencies to define the objectives of cooperation, leading and support roles, information flows, resources and deliverables...*

AHA agrees with this recommendation and sees it as critical to strengthening environmental biosecurity.

*Recommendation 9: The IGAB should make clearer commitments to environmental biosecurity...*

While AHA generally agrees with this recommendation, we note that environmental biosecurity is being addressed by governments and producers, although we recognise there are gaps. AHA recommends that the National Statement of Intent should recognise the work that continues to be done in this area, providing assurance and confidence to stakeholders that the IGAB does cover environmental biosecurity, (albeit with some improvements to be made. Also, AHA recommends that a gap analysis (and therefore identify risks) needs to be conducted as a priority.

*Recommendation 10: The Australian Government should establish the senior, expert position of Chief Environmental Biosecurity Officer within the environment department...*

While AHA supports this recommendation and note there is an opportunity to strengthen participation and engagement of the Department of Environment by housing this position there. The formalisation of this relationship would hopefully strengthen commitments and the resourcing of environmental biosecurity that it deserves and to enable a fuller participation of the Department of Environment.

*Recommendation 11: The NBC should establish and resource a new Environmental Biosecurity Committee...*

AHA supports this recommendation, and notes that should this committee be developed, it would be useful for AHA to be engaged in it (as an observer).

*Recommendation 12: Greater and explicit roles should be developed for AHA and PHA in environmental biosecurity, instituted through amended constitutions and expanded board expertise.*

AHA opposes this recommendation. There is a significant risk that by widening the scope of AHA we will be in danger of diluting its focus and over-committing, spreading itself too thin on already stretched resources. AHA's members contribute significantly to environmental biosecurity as part of their normal business practice and that this should not be overlooked. AHA's interest in environmental biosecurity is framed by its impact on livestock production and as such we seek to be involved in discussions, initiatives and relevant committees

*Recommendation 13: Jurisdictions should adopt a systematic approach to determine and plan for national priority animal, plant and environmental pests and diseases.*

AHA acknowledges there is merit in this recommendation in so far as there is not currently clear alignment between how animal health surveillance might be prioritised versus which diseases have national response plans developed. Taking a more systematic approach – combined with enhanced

collaboration – should achieve greater advantage nationally. There could be opportunity for AHA to have involvement in coordinating some (not all) of these activities, especially since many activities AHA is involved in already contribute to most of the activities in this list.

### Research and innovation

*Recommendation 15: The sectoral committees of the NBC, with the endorsement of the NBC, should develop an agreed set of National Biosecurity R&I Priorities...*

While the development of an agreed set of national biosecurity R&I priorities would be helpful so as to better inform and provide guidance to RDCs as well as other biosecurity stakeholders in prioritising their sectoral investment, it is important that it also complements rather than duplicates any work already being undertaken by the cross sectoral plant and animal biosecurity RDE strategies. It is also AHA's view that national biosecurity RDE coordination, reporting and accountability would benefit from stronger direction from and engagement with NBC. Therefore AHA's recommends that it becomes the direct responsibility of NBC with appropriate mechanisms put in place to ensure continued engagement with the AgSoc R&I Committee.

*Feedback request 3: The Review Panel seeks feedback on two options for a new entity for cross-sectoral biosecurity R&I...*

AHA does not support option 1 or option 2 seeing this as further duplication of existing mechanisms competing for limited resources and adding further costs and complexities to the system. In our view, it would be more efficient and effective to better utilise and build on the nationally agreed animal, plant and environmental biosecurity strategies and already established vehicles and approaches. National biosecurity RDE prioritisation, coordination and investment will be further improved by an initiative currently being progressed by Plant Health Australia (PHA), which builds on and complements existing plant RDE structures and mechanisms, including the National Plant Biosecurity RDE Strategy. It is a significant step change to making substantive improvements without duplicating efforts. AHA believes such an initiative is equally beneficial and applicable in animal biosecurity RDE.

### Strengthening governance

*Recommendation 16: A future IGAB should remain an agreement between the First Ministers of the Australian, state and territory governments. AND*

*Recommendation 17: First Ministers should, within IGAB2, identify lead ministers and agencies for biosecurity (assumed to be agriculture or primary industries) and require supporting whole-of-government arrangements to be in place, including through memoranda of understanding.*

AHA agrees with recommendations 16 and 17. It is important that biosecurity remain front of mind with First Ministers, and to ensure that biosecurity is sufficiently resourced.

*Recommendation 19: The NBC should include the CEO of the Australian Local Government Association, and the New Zealand Government be invited to include a representative.*

AHA agrees with the recommendation but with the following modification that the Chief Executive Officer of the Australian Local Government Association participate but as an observer. Importantly, AHA recommends that the IGAB Review Panel make a specific proposal that given AHA and PHA are such central parts of the biosecurity system they become full members of NBC and relevant sub-committees, as both organisations are key engagement conduits for government members with industry stakeholders, further embedding the partnership approach.

*Recommendation 20: The NBC should adopt a sub-committee structure that aligns with the revised national biosecurity system objectives and national reform priorities in the IGAB...*

While AHA generally agrees with this recommendation to provide clarity about the specific issues each committee is responsible for, we note that the proposed sub-committee structure for NBC differs from the existing roles and responsibilities of the current sub-committees. Consideration needs to be given as to how these proposed new structures will work – including roles and responsibilities, and how key stakeholder engagement will be maintained and enhanced. There is a risk that by widening the scope of these sub-committees to encompass ‘all production animal/plant biosecurity issues’ it will dilute the focus of these sub-committees and stretch resources and commitments too far.

*Recommendation 25: AGSOC should establish, as a priority, an Industry and Community Advisory Committee to provide advice to the NBC on key policies and reforms.*

AHA agrees with this recommendation. However, more thought needs to be given to the structure, operations and purpose of such a committee given the large number of industry and community interest groups it will need to accommodate. Other options and possible engagement points and communication methods should be explored that might ultimately feed into such a committee.

*Recommendation 26: The NBC should convene a dedicated annual national Biosecurity Roundtable for AHA and PHA members to provide direct input to the NBC.*

The joint AHA and PHA Industry Forum, which is held annually, is an existing mechanism for the NBC to engage with industries and that could be better utilised by NBC.

### Funding our national system

*Recommendation 32: AHA and PHA should coordinate an industry stocktake of national biosecurity system investments, making the results publicly available.*

Undertaking such a stocktake is both challenging and expensive, competing for already limited and stretched AHA member funds. The issue of funding would need to be resolved. Considering the ongoing pressure on industry and government resources (and with an eye to Recommendations 34 and 35), AHA suggests that a more effective first step would be to undertake a national ‘stocktake’ of industry animal health and biosecurity ‘levies’ and fees etc. collected by all governments. If investments and investment frameworks are to align with priorities then current biosecurity funding arrangements for industry need to be modernised to meet the needs of Australia’s biosecurity system.

*Feedback request 5: The Review Panel seeks feedback on two options to ensure a more rapid-response to an exotic pest or disease incursion.*

AHA does not agree with either of these options because we note that Australia already has long-standing joint industry–government arrangements in place for responses to livestock emergency diseases (the EADRA), emergency plant pests and diseases (the EPPRD), and biosecurity incidents that primarily impact the environment and/or social amenity and where the response is for the public good (the NEBRA). The cost sharing arrangements of EADRA are specifically designed to encourage a rapid transition from investigation to response and ensure that a response can be rolled out as rapidly as possible and to reduce spread. Moreover, both options go against the spirit and intent of the EADRA and potentially provide a greater benefit for affected jurisdictions as opposed to all signatories and are thus intrinsically biased and imbalanced; changing them may have potentially significant negative unintended consequences.

*Recommendation 33: The emergency response deeds for aquatic animals and exotic production weeds should be finalised within 12 months.*

While AHA agrees that these deeds need to be finalised as soon as practical, we note that the current project to develop an aquatic deed is scheduled to produce a draft document by the end of the 2017 calendar year for consideration by potential signatories. Significant high level industry and government engagement will be required to ratify the deed once drafted, and critically the development of relevant industry emergency levy mechanisms.

*Recommendation 34: State and territory governments should review their biosecurity cost-recovery arrangements to ensure they are consistent, appropriate and transparent. AND*

*Recommendation 35: All levels of government could help meet their budgetary challenges by reviewing biosecurity levies and rates/charges currently or potentially applying to system participants...*

AHA supports both recommendations and refers to our comments under Recommendation 32 i.e. a national 'stocktake' of industry animal health and biosecurity levies and fees etc. that are collected by all governments would also better inform funding of our national system. AHA also supports the Review Panel's suggestion to introduce an incoming passenger charge as an option to fund specific components of the national biosecurity system.

*Recommendation 36: The NBC should establish a time-limited task group to progress development of a performance framework and performance measures for the national biosecurity system.*

AHA supports this recommendation - regular monitoring and reporting on progress to all parties and stakeholders is required to ensure it is delivering results and on track to achieve agreed outcomes.

*Recommendation 37: The Australian Government should facilitate development of an integrated, national biosecurity information system to provide a common platform for all jurisdictions to share and access biosecurity data and information in the national interest.*

AHA acknowledges and strongly supports the need for an integrated, national biosecurity information system – our trading partners expect it, and it is required to ensure Australia has the capability to properly manage and respond to biosecurity risks. We are concerned that this recommendation to develop and implement more/better software platforms will fall short without a genuine will on behalf of Australian jurisdictions on sharing information.

*Recommendation 38: Data and knowledge sharing should be a core commitment of jurisdictions under the IGAB. Minimum standards and specifications should be agreed for data sets.*

AHA strongly supports the recommendation that data and knowledge sharing be a core commitment of all jurisdictions under the IGAB. We note the absence of a mention of the National Animal Health Information System (NAHIS) in the draft report. The NAHIS is effectively the implementation of the past and current intergovernmental agreements to share required animal health surveillance information.

### *A future system, a future IGAB*

The suggestion of one deed and one entity, 'Animal and Plant Health Australia' is not new and would need to demonstrate benefit to all parties - government and industries. The possibility of one emergency preparedness agreement seems at this stage remote since it would mean opening the existing agreements and bringing a myriad of vested plant and animal industry interests (and government Treasuries) back to the negotiating table. This may have unintended consequences and at worst result in parties walking away from the Agreements.

## DRAFT RECOMMENDATIONS AND REQUESTS FOR FEEDBACK: ANIMAL HEALTH AUSTRALIA SUBMISSION

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### Knowing and owning our roles and responsibilities

*Feedback request 1: The Review Panel seeks feedback on the draft roles and responsibilities of national biosecurity system participants.*

Animal Health Australia (AHA) is not adequately represented in the overview provided in Table 1. AHA does far more in collaboration with our government and industry members than is outlined in the NGO column. It is recommended that either this column be expanded, or better still an additional column be included to list the important roles and responsibilities of AHA and similar companies (e.g. Plant Health Australia (PHA), Wildlife Health Australia).

Some examples of AHA's roles and responsibilities include (refer to the AHA Strategic Plan; [www.animalhealthaustralia.com.au/our-publications/corporate-publications/strategic-plan/](http://www.animalhealthaustralia.com.au/our-publications/corporate-publications/strategic-plan/)):

- Through successful partnerships with our government and industry members, AHA effectively manages and strengthens Australia's emergency animal disease response arrangements.
- AHA enhances the emergency animal disease preparedness and response capability of AHA and its members.
- AHA strengthens biosecurity, surveillance and animal welfare to enhance animal health, and support market access and trade.

The potential contribution of local government to biosecurity could be better harnessed and strengthened by incorporating into the Local Government role "awareness of Australia's biosecurity system and its requirements and obligations"; this in-turn should assist in raising the awareness, engagement and participation of local and regional communities.

On p13 of the draft Report, the Panel refers to the sophisticated quality assurance programs of the major food retailers to manage food quality and traceability. *"While biosecurity has not been the main focus to date, it is increasingly on the 'risk radar' for their supply chains....Food retailers move a significant amount of product to a large number of locations, including internationally, to maintain quality and supply and there is significant potential for retailers to integrate biosecurity considerations into their existing assurance and traceability programs."* It would therefore be remiss if the draft roles and responsibilities of the national biosecurity system did not also reference in some way the expectation of a greater role for the food/fibre supply chain participants in the national biosecurity system.

*Recommendation 1: The NBC and the proposed Industry and Community Advisory Committee, through an open, transparent and collaborative process, should lead the development of a draft National Statement of Intent for public consultation that outlines:*

- *a vision, goal and objectives for the national biosecurity system*
- *principles for managing biosecurity*
- *the meaning and application of 'shared responsibility'*
- *the roles, responsibilities and commitments of participants, including accountability measures*
- *governance arrangement for the national biosecurity system.*

*The process should involve government (including local government), industry and the community.*

AHA strongly supports the development of a National Statement of Intent as an overarching national policy document, to provide greater clarity to biosecurity participants. Explaining a 'shared responsibility' needs to be done in a way that grabs the attention and engages the everyday person. 'Shared responsibility' and 'biosecurity' are two terms that have little meaning to the general public despite their utmost importance to their own and society's wellbeing. Instead we should follow New Zealand's approach which inherently describes shared responsibility by stating that everyone has a role, "a part to play in our biosecurity system and everyone benefits from it... you all have something at stake in our biosecurity." New Zealand's *Biosecurity 2025 Direction Statement* (P2).

AHA agrees that the National Statement of Intent must be developed jointly and agreed by all major participants – government, industry and key community representatives - through an open, transparent and collaborative process if it is to be meaningful and effective. As the Panel points out: "*local government with its close connections to local, regional and rural Australia has much to offer the national biosecurity system.*" (p13) The expertise, support and contribution of local government to biosecurity could be better harnessed and in-turn strengthened by NBC, by involving local government and industry through the proposed Industry and Community Advisory Committee. It is anticipated that by participating in the Industry and Community Advisory Committee, all members will have the opportunity to ensure that their biosecurity capacity is sufficient to meet their commitments or that support for developing their capacity has been identified and committed.

Additionally, AHA notes that if we are to strengthen environmental biosecurity, a key step required is to clarify the definition of the 'environment' to ensure all stakeholder expectations are in alignment and to manage future expectations, communications and partnerships. The National Statement of Intent would also benefit from recognising the environmental biosecurity work that is already being undertaken by governments, industry and producers. Environmental biosecurity is a discrete element which is woven through the fabric of biosecurity; joining the dots and making the links across the various activities in this spectrum is challenging. We refer the Panel to AHA's comments on Recommendation 9 for further information.

AHA sees the collective development of a National Statement of Intent as an important stepping stone to the eventual development of a national biosecurity strategic plan, under which would sit the national emergency preparedness and response agreements, the jurisdictional biosecurity statements, industry biosecurity strategies, and incorporate the national strategic biosecurity RD&E priorities. A number of industries are currently undertaking the development of Industry Biosecurity Strategies (e.g. Australian Pork Limited, Sheepmeat Council of Australia, WoolProducers Australia). This process entails the development of industry priorities in the animal health, welfare and biosecurity fields and then allocating limited funds to the activities allocated for delivering against the strategic priority areas identified. These feed into the overarching industry strategic plans (such as the Sheep Industry Strategic Plan and complement Meat and Livestock Australia's Strategic Plan, the Red Meat Industry Strategic Plan and AHA's Strategic Plan).

A national biosecurity strategic plan would improve coordination, collaboration and biosecurity investment by setting the national strategic directions for all stakeholders over the long term and binding all to the expected outcomes through a genuine and transparent shared responsibility approach. It would provide a comprehensive picture for all stakeholders of how the nation's strategic priorities bring about the overarching outcomes and most importantly how their work and investments fit with and contribute to the bigger picture. Importantly, a national biosecurity strategic plan would provide long term direction for the nation and give greater effect to partnership opportunities and improve the alignment of activities and investments across the biosecurity continuum.

AHA also recommends that the principles for managing biosecurity will need to address 'mediation' to agree on outcomes or strategies where the preferred outcome for some stakeholders (e.g. production animal industries) may be in conflict with those for other stakeholders (e.g. environmental considerations). It should also be revisited at least every two years to ensure that it remains relevant and continues to have meaning for those it seeks to engage.

## Market access is key

*Recommendation 2: The Primary Industries Technical Market Access and Trade Development Task Group should seek to enhance engagement with industry to ensure that Australia's market access strategies are aligned appropriately through an agreed priority setting process, and that the degree of transparency and communication is carefully weighed against its level of risk to trade activities.*

*Recommendation 3: IGAB2 should strengthen consideration of market access requirements with the next NBC work program.*

Animal health status is a potential technical barrier to existing and future market access arrangements. Given Australia's heavy reliance on exports, supporting and improving market access is an important goal of the national biosecurity system.

It is AHA's view that the NSW Government Department of Primary Industries submission (p15) as detailed in the draft Report (p26) proposes a sensible approach to strengthening market access priorities and outcomes within the national biosecurity system, which would also ensure a more consistent approach to maintaining the confidence of our trading partners. AHA strongly recommends that industry is actively engaged in this approach, to ensure Australia's market access strategies are aligned (as per Recommendation 2).

The NSW approach comprises:

- "Identifying biosecurity related trade limitations and agreeing to priorities and processes for overcoming these issues
- Understanding what we need to do to demonstrate freedom from biosecurity threats to those markets
- Using available data (presence and absence) to build a cohesive picture of status-based programs
- Strengthening surveillance networks utilising government and non-government organisations."

AHA considers NSW's suggested approach would be enhanced by including a component of the Victorian Government Plant Health Committee's Trade Framework approach i.e.:

- "Systems of compliance to provide assurance around implementation of the controls (for example, auditing, verification, non-compliance detection)." [p26 of draft IGAB Report]

*Recommendation 4: Jurisdictions' biosecurity surveillance activities should include pests and diseases that pose the greatest threat to our export markets.*

AHA supports this recommendation because the development of a national priority disease list for livestock will be beneficial to ensuring we manage exotic and endemic disease incidents in a more structured way. AHA notes that the development of such a priority list will require some subjectivity as to what poses the 'greatest threat to our export and domestic markets' – especially where the market may be 'niche'. For example, is this to reflect the threats to the largest industries or the greatest threat to the whole of any one industry's markets? i.e. how will the threats to market access for the alpaca industry (for example) be assessed against those to the cattle industry?

While trade is an important consideration, a broader approach should be applied; biosecurity is about more than market access. The development of a national priority list should also take into account those diseases that also have a significant impact on productivity (and, as a result, indirectly impact market supply, Australia's reputation and/or ability to maintain market share).

## Stronger environmental biosecurity

*Recommendation 8: Jurisdictions should institute formal arrangements between agriculture and environment agencies to define the objectives of cooperation, leading and support roles, information flows, resources and deliverables. The Australian Government agriculture and environment departments should enter into a Memorandum of Understanding, modelled on those with health and immigration agencies.*

AHA agrees and sees this recommendation as critical to the advancement of strengthening environmental biosecurity. The formalisation of this relationship would strengthen commitments and the resourcing of environmental biosecurity, and to enable a fuller participation of the Department of Environment. The achievement of Recommendation 17 concerning whole-of-government arrangements is also important to the success of this recommendation.

*Recommendation 9 The IGAB should make clearer commitments to environmental biosecurity and include:*

- *the principle of ecologically sustainable development*
- *acknowledgement of Australia's international responsibilities under the Convention on Biological Diversity*
- *a program of work to determine, plan and prepare for national priority pests and diseases impacting the environment and native species*
- *a focus on environment and community as well as industry partnerships*
- *invertebrate transmitted diseases as well as animal diseases.*

While AHA generally agrees with this recommendation, we note that environmental biosecurity is already being addressed by governments and producers (although we recognise there are gaps). For example, government biosecurity statements contain information on environmental biosecurity policies and programs relevant to their responsibilities – including feral animal, public health and environmental policies. A recent example of government commitment to environmental biosecurity is the nationally funded eradication program for red imported fire ants in Queensland (the first response to be considered under the NEBRA). The response has economic (tourism), environmental and social amenity drivers.

AHA also notes that Animal Health Committee consider matters related to wildlife and Plant Health Committee consider matters related to the natural environment. Additionally, farmers, as part of their normal business practices, make a significant investment and contribution in environmental stewardship, land care and biodiversity e.g. in the management of pests and weeds on-farm.

AHA recommends that the National Statement of Intent (Recommendation 1) should draw out and reflect this relationship, recognising the work that continues to be done and providing assurance and confidence to stakeholders that the IGAB does cover environmental biosecurity, (albeit with some improvements to be made).

Additionally, AHA notes that if we are to strengthen environmental biosecurity, a key step required is to clarify the definition of the 'environment' to ensure all stakeholders are on the same page and to manage

future expectations, communications and partnerships. Also, AHA recommends that a gap analysis needs to be conducted (and therefore identify risks) as a priority.

Specifically, AHA notes that the wording of the third dot point should be clarified to reflect the recommendation in the table on priority reform areas (pages ix-x). The wording indicates that the NBC work program and outputs should include implementation of a systematic national priority (exotic) pest and disease approach, including for environmental biosecurity risks (also repeated on pages 103-104, and also relevant to Recommendation 40).

AHA notes that the wording of the third dot point is a narrow interpretation of what should be considered a national priority and is arguably inconsistent with the espoused views in the report on enhancing market access and environmental biosecurity. For example, Australia's arbovirus (particularly bluetongue virus) status is of great importance for access to many key overseas markets and is not only relevant to our status for 'exotic' serotypes but also those that circulate seasonally most years (e.g. BTV1 and 21). There would be other examples as well. Clearly, a national approach to the management of some 'endemic' biosecurity risks is also highly advantageous; it would be detrimental to exclude them from consideration in national prioritisation. Further, if the proposed approach were adopted, it could be unclear how the import risk analyses conducted by the Australian Government Department of Agriculture and Water Resources might reflect the proposed national prioritisation process.

Regarding the last dot point, AHA notes that invertebrate transmitted diseases are not necessarily separate from animal diseases (as some animal diseases may be transmitted by invertebrates - and that some production (aquatic) animals are invertebrates).

*Recommendation 10: The Australian Government should establish the senior, expert position of Chief Environmental Biosecurity Officer within the environment department. A less preferred option is to house the position in the agriculture department. The position should report on the effectiveness of Australia's environmental biosecurity arrangements and achievements. Reports should be made publicly available.*

AHA supports this recommendation and we note there is an opportunity to strengthen participation and engagement of the Department of Environment by housing this position there. The formalisation of this relationship would hopefully strengthen commitments and the resourcing of environmental biosecurity that it deserves and to enable a fuller participation of the Department of Environment. (The achievement of Recommendation 17 concerning whole-of-government arrangements is therefore an important key to the success of this recommendation).

Additionally, we note that the discussion in Section 7.2.2 about the NBC's current committee structure, further details are provided as to vision for the Environmental Biosecurity Committee (EBC) and the Chief Environmental Biosecurity Officer (CEBO), including responsibility for all non-production based terrestrial, aquatic and marine pests and diseases. This description is not entirely clear - for example, how would recreational horses, dogs, cats and so on fit under this system? Would the CEBO be responsible? Also, understanding diseases of animals is quite a different expertise to understanding ecology of wildlife, aquatics and other environmental impacts (of disease or other events). AHA recommends that additional consideration is given to determining the proposed roles and responsibilities of the EBC and CEBO versus those of the Animal Health Committee/Animal Biosecurity Committee and Australian Chief Veterinary Officer, respectively.

*Recommendation 11: The NBC should establish and resource a new Environmental Biosecurity Committee (EBC), comprising government and external environment biosecurity experts and representatives from both the animal and plant sectoral committees of the NBC, to support the role*

*of the Chief Environmental Biosecurity Officer. The role of the EBC should be reviewed following its work to prioritise national biosecurity risks impacting the environment.*

AHA supports this recommendation, and notes that should this committee be developed, it would be useful for AHA to be engaged in it (as an observer). If the intent is to engender a more holistic approach across the biosecurity spectrum, then discussions in the proposed committee would have potential implications for how AHA progresses its current work plan, bearing in mind how the roles and responsibilities of this committee are ultimately defined (also refer to comment on recommendation 10 and 20).

Arguably, also, if the intent is to engender this more holistic approach (such as a 'one health' approach), then the IGAB recommendations could go further and include greater engagement of senior public health officials in joint committees.

*Recommendation 12: Greater and explicit roles should be developed for AHA and PHA in environmental biosecurity, instituted through amended constitutions and expanded board expertise.*

AHA opposes this recommendation. There is a significant risk that by widening the scope of AHA we will be in danger of diluting its focus and over-committing, spreading itself too thin on already stretched resources. As mentioned in AHA's first submission to the Discussion Paper and also noted in Recommendation 32, the current biosecurity funding arrangements for industry are insufficient to meet growing future demands.

As stated in Recommendation 8, AHA's members contribute significantly to environmental biosecurity as part of their normal business practice and that this should not be overlooked. In particular, farmers' commitment to environmental stewardship and biodiversity and their efforts to prevent, respond to and recover from pests, diseases and weeds that have an impact on the environment; their management represents a significant cost to the producer and the industry.

AHA's interest in environmental biosecurity is framed by its impact on livestock production and as such we seek to be involved in discussions, initiatives and relevant committees (such as outlined in Recommendation 11 above).

*Recommendation 13: Jurisdictions should adopt a systematic approach to determine and plan for national priority animal, plant and environmental pests and diseases.*

Please also refer to AHA's comments on Recommendation 4 – i.e. the *national list of notifiable animal diseases* (terrestrial animals), and the *national list of reportable diseases of aquatic animals* as agreed by the Animal Health Committee (although we note that neither equate to the intent of a '*national animal disease priority list*'). The respective national lists of reportable diseases of aquatic and terrestrial animals are more about international and domestic market access and trade between jurisdictions. Endemic diseases are included for surveillance purposes to detect unusual incidents involving mortality or sickness of animals and diseases of public health significance.

AHA acknowledges there is merit in this recommendation because there is not clear alignment between animal health surveillance and emergency response priorities. Currently, there are various publications with differing purposes, which leads to duplication of effort as well as gaps resulting from a lack of coordination in information sharing. For example, work to capture current scientific and technical information is undertaken by a number of different individuals and/or collaborative processes but not necessarily shared with others (e.g. information collated by the Animal Biosecurity Branch of the Australian Government Department of Agriculture and Water Resources, AAHL and/or other agencies that could be readily shared to maintain currency in AUSVETPLAN information on diseases). Taking a more systematic approach – combined with enhanced collaboration – should achieve greater advantage nationally.

Based on the proposed planning outlined in Section 5.1.2, there could be opportunity for AHA to have involvement in coordinating some of these activities (not necessarily undertaking them all) – especially since many activities AHA is involved in already contribute to most of the activities in this list.

## Research and innovation

*Recommendation 15: The sectoral committees of the NBC, with the endorsement of the NBC, should develop an agreed set of National Biosecurity R&I Priorities, in consultation with system participants and in line with the agreed national priority pests and diseases. Priorities at a sectoral and cross-sectoral level need to be considered. The priorities should be developed within two years of the final IGAB review report, and should be reviewed every five years.*

While the development of an agreed set of National Biosecurity R&I Priorities to provide guidance to participants and investors would be helpful, care needs to be taken that implementation of this recommendation does not unintentionally result in a duplication of existing effort, without any real change in the direction and improved coordination and collaboration of biosecurity RDE. That being said, an agreed set of National Biosecurity R&I Priorities - which perhaps might benefit from being themed - to address national risks and gaps would better inform and provide further guidance to RDCs, as well as other biosecurity stakeholders, in prioritising their sectoral investment, and to ensure that it complements rather than duplicates any work already being undertaken by the cross sectoral plant and animal biosecurity RDE strategies. (AHA refers the Panel to our comments in Recommendation 1 concerning how a national strategy would provide clearer medium to long term strategic direction through the setting of national strategic priorities (which would also have reference to the national biosecurity R&I priorities) for all stakeholders to work towards over the long term).

AHA notes that the NBC was consulted along with the RDCs and industry bodies in determining the Animal Biosecurity RDE strategy priorities and that progress of these strategies is reported to the R&I committee of AgSOC. Importantly, AHA notes that there is no direct link by way of representation between NBC and AgSoc R&I Committee; instead communication seems to be conducted irregularly and indirectly through the animal and plant biosecurity RDE strategies. AHA notes that the animal and plant biosecurity strategies compete with some 22 national RDE strategies under the remit of the AgSoc R&I Committee. Without doubt, national biosecurity RDE coordination, progress, reporting and accountability would benefit from stronger direction from NBC and therefore AHA recommends that it becomes the direct responsibility of NBC with appropriate mechanisms put in place to ensure continued engagement with the AgSoc R&I Committee.

*Feedback request 3: The Review Panel seeks feedback on the following options for a new entity for cross-sectoral biosecurity R&I:*

*Option 1: Establishing a new stand-alone entity for cross-sectoral biosecurity R&I.*

*Option 2: Addressing cross-sectoral biosecurity R&I within an existing RDC (for example, the Rural Industries RDC).*

*The Panel also seeks feedback on the funding options and would welcome alternative suggestions.*

AHA does not support option 1 or option 2 seeing this as further duplication of existing mechanisms competing for limited resources and adding further costs and complexities to the system. In our view, it would be more efficient and effective to better utilise and build on the nationally agreed animal, plant and environmental biosecurity strategies and already established vehicles and approaches. The challenge is to do more with the current system by setting a clearer direction and improving national RDE biosecurity

coordination - a key first step is to establish an agreed set of national biosecurity R&I priorities and give NBC direct responsibility for biosecurity RDE as detailed in Recommendation 15. All strategies should be revised to reflect these changes as well as include agreed performance measures to evaluate success against the agreed national biosecurity R&I priorities and how progress will be monitored and reported so as to provide confidence to NBC and stakeholders that implementation of the respective strategy is on track to achieve intended results, and if not, what needs to be done differently to ensure we bring about long-term change.

For example, *The National Animal Biosecurity RD&E Strategy*, managed by AHA on behalf of government and industry stakeholders, including animal-based rural research and development corporations, Australian universities with agriculture and veterinary faculties, CSIRO and the Australian, state and territory governments, recognises a need for a nationally coordinated approach to animal biosecurity research, development and extension (RD&E), to ensure that Australia has the science-based systems and capability required to manage biosecurity risks to our livestock, fisheries and aquaculture industries, public health and trade. Using a partnership approach, the National Animal Biosecurity RD&E Strategy aims to identify and address capability gaps through effective allocation of RD&E resources (including human capability and infrastructure) nationally, by helping to ensure they are applied in an efficient and collaborative way.

National biosecurity RDE prioritisation, coordination and investment will be further improved by an initiative currently being progressed by PHA, which builds on and complements existing plant RDE structures and mechanisms, including the National Plant Biosecurity RDE Strategy. PHA is working with the seven plant RDCs to develop a mechanism that allows consideration and prioritisation of plant biosecurity RD&E. It is a significant step change to making substantive improvements without duplicating efforts. This is a proactive and collaborative approach to managing and coordinating plant biosecurity RDE; one that AHA believes is equally beneficial and applicable in animal biosecurity RDE and which we will seek to reproduce with the livestock RDCs.

## Strengthening governance

*Recommendation 16: A future IGAB should remain an agreement between the First Ministers of the Australian, state and territory governments.*

*Recommendation 17: First Ministers should, within IGAB2, identify lead ministers and agencies for biosecurity (assumed to be agriculture or primary industries) and require supporting whole-of-government arrangements to be in place, including through memoranda of understanding.*

*Recommendation 19: The NBC should include the CEO of the Australian Local Government Association, and the New Zealand Government be invited to include a representative.*

AHA agrees with recommendations 16 and 17. It is important that biosecurity remain front of mind with First Ministers, to ensure the biosecurity system is sufficiently resourced given its fundamental importance to our economy and way of life. The IGAB agreement provides one such mechanism.

AHA agrees in part with recommendation 19. We understand that NBC has initiated and welcomed New Zealand as a representative on the committee. AHA suggests that the Chief Executive Officer of the Australian Local Government Association also be asked to participate, but as an observer. This will support the national framework and strategy of NBC by supplementing it with local government expertise and knowledge. As we identified in Feedback Request 1 this would better harness the potential contribution of local government to biosecurity and improve awareness of our national biosecurity system and its

requirements. This should assist in raising the awareness, engagement and participation of local and regional communities.

Further, AHA recommends that the IGAB Review Panel make a specific proposal that AHA and PHA become full members of NBC and relevant sub-committees, as both organisations are key engagement conduits for government members with industry stakeholders. The unique government and industry structure of the companies, the partnerships and leveraged investments through collaborations has clearly demonstrated benefits. We agree with PHA where it states in its submission to the draft Report that “it would be beneficial to all that the organisations are made members of NBC, further embedding the partnership approach (p4)” and “... since PHA and AHA are such a central part of the biosecurity system, the companies should be included as members of the NBC” (p7).

*Recommendation 20: The NBC should adopt a sub-committee structure that aligns with the revised national biosecurity system objectives and national reform priorities in the IGAB. All NBC working groups and expert groups should be task-specific and, wherever possible, time-limited.*

While AHA generally agrees with this recommendation to provide clarity about the specific issues each committee is responsible for, we note that the proposed sub-committee structure for NBC differs from the existing roles and responsibilities of the current sub-committees. This will therefore have implications for how sub-committees, such as the newly proposed Animal Biosecurity Committee function, and how they engage with key stakeholders such as AHA. The IGAB Review Panel should give consideration as to how these proposed new structures will work – including roles and responsibilities, and how key stakeholder engagement will be maintained and enhanced. There is a risk that by widening the scope of these sub-committees to encompass ‘all production animal/plant biosecurity issues’ it will dilute the focus of these sub-committees and stretch resources and commitments too far. AHA therefore recommends that representation of these sub-committees will be important to ensure the appropriate breadth and scope of expertise, adequate resourcing to ensure workloads can be achieved and strong secretariat support to ensure committee workflow and management is achieved.

We also refer to our response to Recommendation 10 regarding the proposed NBC sub-committee structure, in particular clarity regarding the roles and responsibilities of the Environmental Biosecurity Committee (EBC) and the Chief Environmental Biosecurity Officer (CEBO) regarding horses, dogs, cats etc.

*Recommendation 25: AGSOC should establish, as a priority, an Industry and Community Advisory Committee to provide advice to the NBC on key policies and reforms.*

AHA agrees that an industry and community consultative and advisory committee is urgently required to give effect to a true partnership approach, to improve awareness of the biosecurity system and respective roles, and most importantly to foster trust. However, AHA believes more thought needs to be given to the structure, operations and purpose of such a committee given the large number of industry and community interest groups it will need to accommodate – which may ultimately make the committee unwieldy and ineffective.

Other options and possible engagement points and communication methods, which should be explored – and which may ultimately feed into such a committee – such as:

- AHA’s and PHA’s respective government and industry Members’ Forums
- AHA’s and PHA’s respective Industry Forums (and joint Industry Forum)
- Australian Government Department of Agriculture and Water Resources biosecurity roundtables
- the Aquatic Deed government and industry working group
- Wildlife Health Australia and Zoo and Aquarium Association national representative networks.

*Recommendation 26: The NBC should convene a dedicated annual national Biosecurity Roundtable for AHA and PHA members to provide direct input to the NBC.*

As per our comments in response to the IGAB discussion paper, the joint AHA and PHA Industry Forum, which is held annually, is an existing mechanism for the NBC to engage with industries and that could be better utilised by NBC.

## Funding our national system

*Recommendation 32: AHA and PHA should coordinate an industry stocktake of national biosecurity system investments, making the results publicly available.*

AHA does not agree with this recommendation, unless adequate funding and resourcing of the tasks involved are made available to both AHA and PHA.

Undertaking such a stocktake would be challenging as well as expensive, and would need to be funded on an ongoing basis in order to ensure its currency, usefulness and value. As such an activity would compete for already limited and stretched AHA member funds, the issue of funding would need to be resolved.

Further, the effectiveness and success of such a stocktake is dependent on resolution of Recommendations 27, 28 and 29 which are needed to inform a stocktake approach, its categories and definitions across a complex area spanning multiple elements, partnerships and investors. Resolution of these recommendations is also necessary in order to engender meaningful and reasonable comparisons across industries and between jurisdictions as well as help form a more rounded picture of total national investments in biosecurity.

Considering the ongoing pressure on industry and government resources (and with an eye to Recommendations 34 and 35), AHA suggests that a more effective first step would be to undertake a national 'stocktake' of industry animal health and biosecurity 'levies' and fees etc., which are collected by all governments. As mentioned in our response to the IGAB discussion paper, as governments have increasingly moved to give effect to the principle of biosecurity as a shared responsibility focusing their investments on where their return is highest on the generalised invasion curve, this has put more pressure on industry funds and existing funding mechanisms. Compounding this pressure, is that in addition to the national levy arrangements that are in place for livestock industries, some producers also pay additional levies (and/or fees) for animal health, biosecurity and other services delivered by some jurisdictions. These additional jurisdictional 'levies' also need to be accounted for when considering any new future funding model and/or review of national levy arrangements because they affect producers' ability to pay for and, in-turn, invest in agreed national biosecurity priorities. If investments and investment frameworks are to align with priorities, then current biosecurity funding arrangements for industry need to be modernised to meet the needs of Australia's biosecurity system.

*Feedback request 5: The Review Panel seeks feedback on the following options to ensure a more rapid-response to an exotic pest or disease incursion:*

*Option 1: Cost-sharing arrangements should provide for four weeks of monitoring, assessment and preliminary control strategies, while an overall assessment is conducted on the possibility of successful eradication.*

*Option 2: Cost-sharing arrangements should include a default funding arrangement for when decisions cannot be quickly reached about the success or otherwise of an eradication program.*

AHA does not agree with either of these options because we note that Australia already has long-standing joint industry–government arrangements in place for responses to livestock emergency diseases (the EADRA), emergency plant pests and diseases (the EPPRD), and biosecurity incidents that primarily impact the environment and/or social amenity and where the response is for the public good (the NEBRA).

The EADRA, for example, is a contractual arrangement that was signed in 2002, which brings together the Australian, state and territory governments and livestock industry groups to collectively and significantly increase Australia’s capacity to prepare for—and respond to—EAD incursions. The EADRA covers more than 60 categorised emergency animal diseases and has 23 Signatories (governments and industry bodies).

The main benefit of the EADRA is the ability to respond quickly and effectively to an EAD incident while minimising uncertainty over management and funding arrangements.

AHA does not believe that the Report's comment that “*provisions within the existing emergency response deeds ... are not working effectively*” (p 84) applies to the EADRA. We note that this context may possibly refer to a plant/pest problem where the investigation to identify a cause, delineate the extent and distribution and make a judgment call on the potential for eradication may take a very long time. The EADRA is very clear that activities during the investigation/incident definition phase are a part of normal commitments (i.e. those baseline commitments, above which other costs would normally be shared), and affected Parties are unlikely to agree to share costs for an agreed normal commitment.

The intention of the EADRA is transparent with regard to cost sharing the incident definition phase as evident in Clause 10.1 which states:

*“10.1 Cost Sharing - Incident Definition Phase*

*The State or Territory in which the Incident has occurred will meet the cost of the Incident Definition Phase except that:*

*(a) once an EADRP has been agreed, Cost Sharing principles will apply in respect of Compensation costs from:*

*(i) the date of first notification of the Incident to the relevant State or Territory, or*

*(ii) such earlier date as may be agreed by the NMG on the advice of the CCEAD;  
and*

*(b) where the NMG determines that the cost of Compensation to Owners or diagnostic costs will be shared, they will be shared in accordance with this Deed should an EADRP proceed.”*

The cost sharing arrangements of EADRA are specifically designed to encourage a rapid transition from investigation to response and ensure that a response can be rolled out as rapidly as possible and to reduce spread. It is AHA's view that a cost sharing in the investigation phase is more likely to slow down the process of rolling out the response.

Moreover, both options go against the spirit and intent of the EADRA and potentially provide a greater benefit for affected jurisdictions as opposed to all signatories and are thus intrinsically biased and imbalanced; changing them may have potentially significant negative unintended consequences. In particular, Option 2 is likely to delay decision making until more is known about the disease when responders should be able to make decisions in the face of imperfect information.

Focus instead should be on all Signatories to the EADRA (and EPPRD) to ensure their normal commitments can be met by maintaining the capability and capacity to respond to a suspect or confirmed emergency

animal disease (and emergency plant pest) incident promptly and appropriately, and identifying relevant arrangements to meet their normal commitments and addressing any gaps.

*Recommendation 33: The emergency response deeds for aquatic animals and exotic production weeds should be finalised within 12 months.*

While AHA agrees that these deeds need to be finalised as soon as practical, we note that the current project to develop an aquatic deed is scheduled to produce a DRAFT document by the end of the 2017 calendar year for consideration by potential signatories. We also note that significant high level industry and government engagement will be required to ratify the deed once drafted, and critically the development of relevant industry emergency levy mechanisms – all of which will take a significant amount of time and effort to complete.

*Recommendation 34 State and territory governments should review their biosecurity cost-recovery arrangements to ensure they are consistent, appropriate and transparent.*

*Recommendation 35 All levels of government could help meet their budgetary challenges by reviewing biosecurity levies and rates/charges currently or potentially applying to system participants. These should be commensurate with agreed national cost sharing principles, which the Review Panel considers should be reviewed.*

AHA supports both recommendations and refers to our comments under Recommendation 32 i.e. a national ‘stocktake’ of industry animal health and biosecurity levies and fees etc. that are collected by all governments would also better inform funding of our national system. AHA also supports the Review Panel’s suggestion to introduce an incoming passenger charge as an option to fund specific components of the national biosecurity system.

## Measuring system performance

*Recommendation 36: The NBC should establish a time-limited task group to progress development of a performance framework and performance measures for the national biosecurity system.*

AHA supports this recommendation - regular monitoring and reporting on progress to all parties and stakeholders is required to ensure it is delivering results and on track to achieve agreed outcomes. As stated in our submission to the Discussion Paper, while the current IGAB and jurisdictional biosecurity strategies identify high level outcomes against priority areas, it falls short by failing to provide performance indicators (qualitative or quantitative) that demonstrate to the parties (and other partners/investors) it is reaching set outcomes.

*Recommendation 37: The Australian Government should facilitate development of an integrated, national biosecurity information system to provide a common platform for all jurisdictions to share and access biosecurity data and information in the national interest.*

AHA acknowledges and strongly supports the need for an integrated, national biosecurity information system – our trading partners expect it, and it is required to ensure Australia has the capability to properly manage and respond to biosecurity risks.

While AHA recognises investment has already been made in a number of areas (i.e. the proposed Biosecurity Integrated Information System (BIIS), MAX, AusPestCheck etc), we note that more actual sharing of important biosecurity surveillance information is still required and should be resolved as a matter of urgency. We are concerned that this recommendation to develop and implement more/better software platforms will fall short without a genuine will on behalf of Australian jurisdictions on sharing

information. If further sharing of animal disease surveillance information is as important as is regularly identified through various reports, fora etc., then the onus is on the state/territory surveillance managers, industry representatives, and representatives of the various Australian Government Department of Agriculture and Water Resources sections to demand this through the NAHIS program.

We need to move past saying we ‘should share’ since it does not seem to effectively address this critical impasse. Instead all parties with joint responsibility for the national biosecurity system (Australian Government, jurisdictions and industries) must identify and explain the biosecurity surveillance information required to manage disease risks, and substantiate their claims about disease status, and measure performance ( also refer to our comments under Recommendations 2 and 3).

*Recommendation 38: Data and knowledge sharing should be a core commitment of jurisdictions under the IGAB. Minimum standards and specifications should be agreed for data sets.*

AHA strongly supports the recommendation that data and knowledge sharing be a core commitment of all jurisdictions under the IGAB.

We note the absence of a mention of the NAHIS in this IGAB review draft report. The NAHIS is effectively the implementation of the past and current intergovernmental agreements to share required animal health surveillance information – namely information required by the Australian Government Department of Agriculture and Water Resources for international trade and market access. The data contained within NAHIS are effectively the current nationally agreed surveillance data standard. If further sharing of animal disease surveillance information is required – additional to that provided via the NAHIS, then jurisdictional surveillance managers, industry representatives and Australian Government representatives on the NAHIS Coordination Committee have the opportunity to request the additional information be incorporated into the NAHIS (also refer to Recommendation 37).

## A future system, a future IGAB

The *IGAB Review Draft Report*, Chapter 10 considers features and characteristics for the national biosecurity system in 10 to 15 years’ time to ensure the system is fit for the future. Of particular interest to AHA are:

- a. one emergency preparedness agreement for the national priority animal, plant and environmental pests and diseases
- b. one entity responsible for implementation and administration of the deed, potentially ‘Animal and Plant Health Australia’.

The suggestion of one deed and one entity, ‘Animal and Plant Health Australia’, is not new and is a matter for AHA and PHA members; a case would need to be made to demonstrate benefit to all parties, both government and industry signatories. The possibility of one emergency preparedness agreement seems at this stage remote since it would mean opening the existing agreements and bringing a myriad of vested plant and animal industry interests (and government Treasuries) back to the negotiating table. This may have unintended consequences and at worst result in parties walking away from the Agreements.