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Dr Wendy Craik
Chair
Intergovernmental Agreement
on Biosecurity Review Panel

via email: igabreview@agriculture.gov.au

Dear Dr Craik

Review of the Intergovernmental Agreement on Biosecurity Draft Report

Australian Pork Limited (APL) is the national representative body for Australian pig producers. It is a producer-owned, not-for-profit company combining marketing, research & innovation and policy development to assist in securing a profitable and sustainable future for the Australian pork industry. APL works in close association with key industry and government stakeholders.

The Australian pork industry employs more than 20,000 people in Australia and contributes approximately \$3 billion in gross domestic product to the Australian economy. The pork industry contributes approximately 2.13 per cent of total Australian farm production with roughly 1500 pig producers producing over five million pigs for slaughter annually.

APL welcomes the opportunity to provide a submission to the review of the Intergovernmental Agreement on Biosecurity (IGAB) draft report. The Australian pork industry invests significantly in an effort to maintain the high health status of the Australian pig herd. Biosecurity is an essential element – at the border, at state levels, on farm and throughout the wider community. Thus, APL supports the review of the IGAB and the recommendations presented in the draft report.

Knowing and owning our roles and responsibilities

APL supports the definition of 'shared responsibility'. Noting the Review Panel's comments on cost shifting:

Shared responsibility has been criticised by some industry stakeholders as cost shifting. While governments will have a responsibility to assist in encouraging and involving other system participants, consideration of public and private benefits will need to be made where funding is an issue. A separate, second step would involve developing a means to measure how effectively system participants are meeting their defined roles and responsibilities.

However, there are many examples of cost shifting occurring and APL has one example of state government attempting to push the cost of legislation changes on to industry.

APL has previously commented on government's responsibility for the broader community and environment. There is a significant public good associated with biosecurity, and governments should ensure their funding activities reflect this.

APL acknowledges the cost pressures faced by governments and the motivation to recover costs. As a shared responsibility, biosecurity funding must be monitored to ensure cost-shifting from governments to industry does not occur, especially where the shift is inconsistent with the responsibilities of governments, for example by a new pest species or diseases becoming established on public land thereby rendering it an ongoing problem for governments, industry and farmers.

Request for feedback 1: The Review Panel seeks feedback on the draft roles and responsibilities of national biosecurity system participants.

While APL acknowledges the Review Panel's attempt to define roles and responsibilities, communication and engagement responsibilities must be more clearly defined.

The Review Panel notes:

Communication and engagement is neither a project, nor the work of a committee. It is core, day-to-day business for all system participants.

However, communication and engagement of industry in this space is often lacklustre. A number of submissions to this review process noted that engagement of industry through IGAB or National Biosecurity Committee (NBC) could be greatly improved.

The notion of biosecurity management as a shared responsibility should strengthen the biosecurity system by identifying collaborative opportunities, beyond governments. This can only be achieved if there is active communication with and engagement of all participants outside of government and while the Review Panel does not consider it the work of the committee, communication and engagement responsibilities should be more clearly defined in allocating roles to various participants. Moreover, opportunities for collaboration between government and industry must be explored to reduce duplication and the potential for perverse outcomes. This is relevant not just to biosecurity but across the spectrum of federal, state, territory and local government policy areas.

For IGAB to succeed in achieving the objectives presented in the Beale Review it needs to ensure industry is engaged through inclusion, consultation and an adequate feedback mechanism. Follow-up of actions or outcomes from various meetings, such as the Biosecurity Roundtable, is drawn out and often do not demonstrate where or how industry views have been acknowledged or incorporated.

Market access is key

Biosecurity matters and Australia's biosecurity is particularly important with the increase in global trade and the movement of people across the world. The Australian pork industry enjoys a high herd health status, with freedom from some of the world's worst pig diseases. Along with governments, the Australian pork industry works diligently to maintain this status both nationally and at a farm-level. Biosecurity is our comparative advantage in the global pork trade – and Australian pork attracts a premium because of its reputation as an exporter of safe food.

As indicated earlier in this submission, industry must be consulted on the priority setting process including increased transparency so there is greater accountability for agreed priorities. Additionally, industry is often better placed than governments to identify risks and the wider impacts they may cause but this is rarely acknowledged when market access is being negotiated.

There is a notion of biosecurity being 'negotiated away' through trade deals. In some cases this can result in one agricultural commodity gaining access to a market at the expense of the other domestic product. This approach has become mainstream. As an example, New Zealand relaxed import restrictions to allow fresh pork imports, but gained lamb into export markets.

The 'clean, green and pest and disease-free status' is a significant competitive advantage for Australia and its agriculture industry. However, for the pork industry, a number of competitor countries seek to undermine this asset by putting pressure on DAWR to review the pork biosecurity import risk assessment (Pork BIRA). Yet in research undertaken by APL, those same competitors have also stated that Australia's pork protocols are our most significant asset and that Australia should protect this science based measure.

Research and innovation

APL suggests governments could focus investment in emerging trends of disease, pests and weeds, including the role of the movements of people and goods in spreading pests and disease, and robust systems to manage this. Future technologies that can be employed to assist with surveillance and biosecurity strategies may be a useful investment option for governments. As an example, investing in big data and the use of algorithms to predict future trends and risks will only work if consultation with industry occurs prior to commencement of a project, and is ongoing throughout its duration. Investment in people with the capability to do this, such as futurists, is not impractical. This would challenge the current thought processes and influence wider thinking to be more future focussed.

Strengthening governance

The draft report suggests that an Industry and Community Advisory Committee (ICAC) to be formed and assist NBC with delivering a National Statement of Intent. However, ICAC can be employed to deliver far more engagement than just contributions to developing a National Statement of Intent.

ICAC could be an avenue for wider engagement of industry on perceived priorities and for harbouring the views of industry to feed back into NBC decisions. There was little, if any, industry consultation and agreement on these priority areas. Industry views on the listing and review process of priority areas should be sought, including how they may be addressed.

Furthermore, industry is often well-positioned to lead initiatives and collaborative activities, and this should be supported by governments. Industry holds foundational knowledge, has access to up-to-date scientific resources and often has the capacity to conduct research to support priority areas.

Should you have any questions about this submission, please do not hesitate to contact Jessica Edington on 02 6270 8832 or Jessica.Edington@australianpork.com.au.

Yours sincerely



Deb Kerr
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