

## Australian Vignerons – Submission to the Draft Report of the Intergovernmental Agreement on Biosecurity

Australian Vignerons is the new trading name of Wine Grape Growers Australia (WGGA). It is the national peak body that represents those who grow and make wine across Australia. The change in name and membership category reflects the change to the wine industry since 2005 when WGGA was first formed, in that many growers now make and market their own wine brands, and many winemakers grow their own wine grapes. This organisation, along with the Winemakers' Federation of Australia (WFA) represent the majority of the wine industry's production.

The two organisations are separate, but work in close alliance on areas of common interest in the wine industry. Biosecurity is one such issue.

Australian Vignerons (AV) welcomes the opportunity to provide comments to the IGAB review. As the wine industry signatory to the emergency plant pest response deed, and member of Plant Health Australia, AV is the organisation with national remit in addressing biosecurity issues in the wine industry. It is, however, an organisation with limited resource, and works in collaboration with other bodies such as Wine Australia, Vinehealth Australia, the Victorian Vine Biosecurity Committee, the Australian Wine Research Institute (AWRI) as well as WFA.

Given that Australian Vignerons only deals with the wine industry, the following submission is from the perspective of the wine industry.

There are core problems with the concept of shared responsibility, and the manner in which biosecurity responsibilities in the wine industry area funded. The primary limitation to better support and results with biosecurity programs is the low level of engagement with many within the wine industry, in particular the grower base. This springs from the core problem that the wine industry has not been profitable for some time, and many growers and some winemakers view biosecurity as a non-core activity. There is a feeling among many that rather than viewing it as a necessity like house insurance, it is viewed as an unaffordable luxury in respect to the time and money needed for the commitment.

The concept of "shared responsibility" cannot gain greater traction until this first stumbling block is overcome. AV is committing to better engagement among the grower base, and is in the process of working on ways in which this might be achieved. It is evident that this lack of engagement is not unique to the wine industry, and remains a fundamental roadblock to achieving acceptable biosecurity outcomes.

AV agrees that the roles and responsibilities of participating bodies are not well understood, and is working with other bodies to address those shortcomings in the wine industry. While the intent of the IGAB is very worthwhile, there is room for improvement in the manner in which different state jurisdictions and industry bodies work together to manage biosecurity responsibilities. While recent experience shows a willingness by these bodies to collaborate, both between state jurisdictions and with industry, it has also shown that the concerns about crossing over remit between jurisdictions can lead to delays in addressing biosecurity issues. Staffs representing state or national government jurisdictions can have different priorities from industry players, and it is essential that the industry voice in managing such issues should not be overpowered.

This is a concern where time is of the essence when addressing issues such as incursions. In an ideal world, there would be seamless interaction and understanding between different state bodies, and indeed between different sectors when dealing with the common and serious challenges that biosecurity responsibilities present.

To that end, AV agrees with the recommendation that the IGAB should draw up shared responsibilities in consultation with industry bodies; and agree that this should be completed as part of an open, transparent and collaborative process. We hope that the draft version of these responsibilities contained in Table 1 in the report are viewed as a guide in that context, and are not to be treated as the final version of these roles and responsibilities. To do so would not be open, transparent and collaborative.

### **Market Access**

AV agrees that market access is key. In the wine industry in particular, Australia is a relatively high cost producer when compared with international competitors. As such, it is imperative that it can retain and if possible expand its high value markets, and the ability to demonstrate pest and disease freedom is integral to this outcome. Australia is free from many of the serious pests and diseases that plague competitor countries, and it cannot afford to lose a high value market in this context. AV agrees that there is a lack of clarity and transparency around the roles of national, state and territory governments in respect to trade.

There is a clear example with the ICA requirements for interstate movement of fruit. The current arrangements are unwieldy, and add a cost and labour burden to growers during the vintage period. There is room for streamlining these regulations via clearer understanding of state and national requirements for the movement of fruit.

AV agrees with the report recommendations that encourage alignment of market access strategies with biosecurity priorities by close engagement with industries. This includes ensuring that the roles and responsibilities of all parties are clear and understood. It goes without saying that biosecurity activities should be focused on disease and pests that pose the greatest threat to export markets, and to sustainable production.

### **Environmental Biosecurity**

AV agrees that environmental biosecurity is important, and supports the idea of increasing the focus on this role. It is questionable, however, if basing a dedicated Biosecurity Officer in a different government department from the current biosecurity activities addressed within DAWR would be wise, in that it would risk encouraging a fragmented approach and possibly a competitive arrangement between the environmental and commercial sectors when dealing with biosecurity issues. Similarly, AV is opposed to creating a separate agency such as "Environmental Health Australia" for the same reason. Addressing environmental biosecurity commitments within the established bodies of PHA and AHA should be possible without creating an additional structure.

AV would be concerned if environmental considerations would eventually eclipse those of the commercial sector that are currently being handled by PHA and AHA. This is not suggesting that environmental biosecurity priorities are treated as less important, but is more suggesting that neither sector should eclipse the other in importance. Commercial biosecurity responsibilities are addressed via funding collected mandatorily from farmers and growers, and it is important that there is a "clear line of sight" from those growers to biosecurity outcomes that are demonstrably relevant to their industry and their sustainability. It is the opinion of AV that including environmental biosecurity activities as part of industry activities, rather than in a separate and detached department will strengthen environmental biosecurity commitments, rather than weaken them.

To that end, draft recommendation 12 in the draft report that PHA and AHA should increase their roles with environmental biosecurity seems at odds with earlier recommendations to establish a separate department for environmental biosecurity activities. The section about improving environmental outcomes is light on detail, so the ability to comment is limited.

### **Research and Innovation**

It is for similar reasons that AV has some concerns about the biosecurity co-operative research centre model for conducting R&I on behalf of industry. While acknowledging that there have been some great outcomes from the previous PBCRC, such as the development of the phylloxera DNA probe, such a model further removes the line of sight between growers and the RD&E funds that are collected and invested on their behalf. At a time of constrained

resources in the wine industry and such hardship for growers and winemakers alike, it is difficult to countenance developing a separate structure that would require additional administration cost unless it is absolutely necessary to do so. AV favors utilizing the existing RDC structures, in the case of the wine industry it is Wine Australia (AGWA), and ensuring that greater cross – sector collaboration exists in order to ensure efficiency and alignment in addressing the biosecurity priorities across all sectors. Greater alignment would allow plant industries to come to an agreement on National biosecurity R&I priorities, as discussed in draft recommendation 15. AV supports this recommendation, along with the suggested review every five years.

In regard to the proposal that a set percentage of levy funds being directed to a new biosecurity R&I entity, the wine industry is facing a decision soon in regard to RD&E levies. The current volumetric collection does not keep pace with CPI, and against the backdrop of increasing RD&E costs there is a strong case for levy reform to ensure that this funding meets future needs. The consideration of how RD&E funding might be allocated in future should bear this in mind. This looming problem makes it hard to consider a new stand – alone cross – sectoral biosecurity R&I entity at least until this issue is addressed.

### **Funding**

Australian Vignerons recognises that there is a need for sustainable funding, and notes comments about “free riders” in the system that do not contribute yet gain benefits from biosecurity commitments made by some industries. This is an unworkable situation and needs redress. It is difficult to see a “user pays” funding model being effective at collecting funds.

The clear benefit in funding preventive activities rather than reactive work (as shown in the generalized invasion curve) strongly support the need for greater funding for consultative, educational engagement at industry level. AV support the suggestion that governments review biosecurity expenditure with a view to providing greater support for the area of greatest benefit; that is, preventive activity.

There is clear benefit in better codifying the roles and responsibilities in biosecurity stakeholder organisations. There is benefit in empowering the NBC, and the suggestion that local government is included is supported. Similarly, there is much to gain from increasing the profile of the NBC. Greater public awareness of biosecurity issues is likely to lead to greater engagement from industry members, and make the concept of shared responsibility a realistic aspiration, and make it easier to demonstrate the benefits of targeted investment in biosecurity outcomes.

### **Summary**

- There is a demonstrable need for greater engagement across many primary industries on biosecurity issues. Failure to do so will limit the chances of successfully addressing biosecurity responsibilities under a future IGAB.
- The Concept of “shared responsibility” is not well understood, largely as a result of the above problem.
- Roles and responsibilities of different entities and players are not well understood. This should be addressed through an open, transparent process.
- Industry representatives have “skin in the game” and should be a vital part of any future IGAB.
- Environmental biosecurity is important, but it is questionable if it should be treated as of higher importance than biosecurity in the commercial sector.
- Locating environmental biosecurity within a different government department from that currently occupied by the commercial sector risks encouraging fragmentation and reducing efficiencies.
- Australian Vignerons is guarded about establishing another CRC or separate existing body for biosecurity. There should be potential to leverage better results through existing biosecurity structures via better collaboration and alignment.
- At a time of limited funds and increasing global movement of trade and people, it is imperative that the greatest result is gleaned from the currently available funds.

- AV is very supportive of the role that is played by PHA, and would like to see PHA recognised as an independent body capable of providing oversight on biosecurity issues.

### Further Questions

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