



IGAB Review Panel
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To the IGAB Review Panel

Thank you for this opportunity to comment on the Intergovernmental Agreement on Biosecurity (IGAB) Review Draft Report.

The Draft Report provides a comprehensive review of the IGAB, and identifies a range of 'themes' — many of which align with areas the Biosecurity Council have identified, over the course of our work, as requiring further action.

However, from the Biosecurity Council's perspective, we feel the Draft Report is lacking evidence — evidence to show whether the IGAB is functioning as expected; evidence of the extent to which the IGAB is achieving its purpose, which is to 'enhance Australia's biosecurity system and strengthen the collaborative approach between Commonwealth and state and territory governments to address Australia's broad range of biosecurity issues; and evidence to support some of the recommendations being made.

We acknowledge that some of the above points may not have been part of the Terms of Reference for the Review; however, any Review of the IGAB should, we believe, 1) assess the IGAB as a framework; and 2) assess the extent to which the anticipated outcomes (as documented in the IGAB schedules) have been achieved. It is through such assessments that we will better understand the value of the IGAB at strengthening Australia's biosecurity system.

We have provided feedback on specific elements of the draft report (attached); and welcome further discussion with you.

Yours sincerely

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DEPUTY CHAIRPERSON
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Attachment.

Biosecurity Council of WA - Formal submission: IGAB Review Draft Report

Measuring the effectiveness of the IGAB

The key questions for the Biosecurity Council are: Is the IGAB functioning as expected? Is it achieving its purpose, which is to 'enhance Australia's biosecurity system and strengthen the collaborative approach between Commonwealth and state and territory governments to address Australia's broad range of biosecurity issues'?

The IGAB Schedules identify the priority reform areas and anticipated outcomes. The structural hierarchy of the IGAB suggests that addressing these reform areas will contribute to achieving the IGAB's purpose. Consequently, evaluating the extent to which these outcomes have been achieved would be a critical part of any review of the IGAB. It is acknowledged that this was not part of the Terms of Reference for the Review; however, it is also noted that the extent to which the IGAB is achieving its purpose (which does appear to be part of the Review) could be more clearly articulated in the Review report.

The Draft Report does note that the IGAB has resulted in 'strong and healthy working partnerships between all governments'; however, evidence is lacking — are the jurisdictions meeting their responsibilities / commitments under the IGAB? The Draft Report also refers to 'the development of sound national policy principles and frameworks' as key achievements of the IGAB. However, questions remain as to the 'soundness' of these policy principles and frameworks. The lack of performance measures (qualitative and/or quantitative) for the IGAB and its schedules is a deficit of the current IGAB that should be rectified in IGAB2. This will also provide a framework for any future reviews of the IGAB. It is noted that IGAB 'work plans' and 'actions plans' are likely to include performance measures; however, it is also critical to have these at the 'IGAB level'.

Key points:

- *Any review of the IGAB should assess the IGAB as an agreement, as well as the extent to which it is achieving its purpose. It is important to know if the IGAB is actually working in terms of helping to enhance the biosecurity system and strengthen collaboration — with evidence to support review findings.*
- *The Draft Report should be amended to provide clear statements addressing the above.*
- *IGAB2 should include robust qualitative/quantitative performance measures. These are important to guide any future reviews of the IGAB.*

Stronger environmental biosecurity

The Biosecurity Council agrees that environmental biosecurity cannot be separated from other biosecurity, and that this should be better reflected in the IGAB. The Biosecurity Council suggests the Draft Report highlights that responsibility for biosecurity sits largely with agriculture departments. Consequently, environmental issues may not be receiving the attention that they deserve. The Council questions

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whether formal arrangements between agriculture and environment agencies will be effective in ensuring that appropriate attention is given to environmental biosecurity (recommendation 8). Nevertheless, such a change should be properly monitored and evaluated, and alternative arrangements considered should formal agreements be inadequate in achieving the objective.

There will be no need for a new Chief Environmental Biosecurity Officer (recommendation 10) if the importance of environmental biosecurity is raised to a higher level within the current positions. Basing this person in the environment department may not achieve the intended outcome, as the legislation and regulations sit with agriculture.

The Council supports the expanding roles of PHA and AHA (recommendation 12) — but this will require substantial change in how they currently operate with agricultural industries currently funding 33% of their activity and agriculture departments funding the rest.

Key points:

- *Elevating the importance of environmental biosecurity will require substantial cultural and structural change. Even if formal agreements, new positions and so on are put in place, the legislation and regulations still sit with agriculture. Any change will require robust monitoring and evaluation, and alternatives put in place if the new arrangements are not working.*

Research and innovation

Recommendation 15. Two years to develop R&I priorities seems a long time. Reviewing every five years is appropriate, as long as there is a mechanism to enable review on an ad hoc basis. Biosecurity never follows the agreed script and there needs to be flexibility in the system.

Feedback request 3. Cross-sectoral biosecurity R&I could be addressed within an existing RDC. It is the Council's view that the RIRDC would be appropriate.

Key points:

- *The 5-yearly system for identifying and reviewing R&I priorities is flexible to account for the ever-changing biosecurity landscape.*

Funding our national system

The Council agrees that current biosecurity expenditure needs to be reviewed, with a view to redirecting funding into areas that return the highest yields (recommendation 30). However, a timeframe is needed. Often, 'yields' may not be realised until many years into the future. It is important that the longer-term benefits of expenditure are fully considered.

There is no evidence that the current Risk Return Resource Allocation model is delivering any benefit to Australia's biosecurity system. For the Draft Report to recommend its wider use (recommendation 31), some evidence is needed to show that it is providing benefit 'other than allowing government to reduce expenditure'. The biosecurity science fraternity is more of the view that the RRA model reduced the effectiveness of the biosecurity system, resulting in a greater number of

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incursions. The recent incursions of Russian Wheat Aphid and Khapra beetle incursions in South Australia, and Tomato Potato Psyllid in Western Australia are good examples of incursions of 'priority' exotic species that may be attributed to the application of the RRRRA model.

Feedback request 5: Confirmatory diagnostics are often the determining factor for the length of time before final decisions can be made. While four weeks is appropriate for some pests, there may be others that take significantly more time — any system must be flexible to factor this in.

Key points:

- *Funding is redirected to areas that return the highest yields in short-, medium- and long-term.*
- *The Review Panel review its recommendation to extend the RRRRA model to all jurisdictions and their investments. Further investigation/evidence is required to show that RRRRA is effective and supports the biosecurity system before.*
- *Rapid response to an exotic pest/disease incursion is critical; however, any system must be flexible — particularly in relation to the time required for confirmatory diagnostics to be performed.*

A future system, a future IGAB

The review mentions the need to have a more generic approach to pests and diseases — but still focuses on the need to identify the high priority pests and diseases for agriculture and the environment. If a system is to have the flexibility it needs to respond to any new threat, given our ability to predict risk is not always effective, it must ensure any processes implemented are based on generic threats. The IGAB2 should not be tightly bound to pre-identified priority lists. There are documented examples, based on real experiences, that demonstrate that a more generic approach (for example, using exemplar species rather than 'priority lists') can provide an effective and flexible system of biosecurity. Such an approach then lends itself to generic risk assessment, risk measures and so on.

Key points:

- *The focus on 'priority species' and 'lists of priority pests' restricts thinking and action, and cannot support a robust and flexible biosecurity system.*
- *The biosecurity system must be able to respond to any new threat — whether known or unknown. Consequently, the system must be flexible to be effective.*