

27 February 2017

Intergovernmental Agreement on Biosecurity Review  
Secretariat Department of Agriculture and Water Resources

### CSIRO Response to the recommendations of the IGAB Review

We welcome the opportunity to respond to the recommendations of the IGAB Review. The review committee has achieved a great deal in reviewing the value and operation of IGAB and has provided some significant food for thought in its recommendations.

We regard the IGAB as a nationally significant agreement, underpinning the necessary collaboration required between jurisdictions and the Commonwealth to deliver effective Biosecurity outcomes for Australia under our Federated system.

In response to the request to keep responses brief and to the point we have provided very direct comments on each recommendation, expanding them only where we wish to make a particular point or disagree with the recommendation.

We are however, very happy to provide further direct comment if required in the finalisation of the IGAB review.

Yours sincerely

A handwritten signature in black ink, appearing to read "G. Fitt".

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# CSIRO responses to IGAB Review Recommendations

## 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.

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 arrangements for the national biosecurity system.

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

***While not wanting to see further reports on biosecurity, this development of a national Statement of Intent would be valuable as a measure to reset the IGAB in the context of the new Biosecurity Act. We support this suggestion.***

## Market access is key

Feedback request 2: The Review Panel seeks feedback on the total effort and costs associated with demonstrating area freedom by jurisdictions, and the value of that trade.

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.

***Supported, but this needs to be supported by a rigorous risk analytical framework built on available detection data and we note that current border surveillance data is closely held and often constrains the capacity of research organisations to help with interpretation of the impact of surveillance. A more open arrangement between Government, industry and research would be beneficial.***

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

***Strongly agreed.***

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

***Strongly agree. The level and priorities of investment by jurisdictions in surveillance for key threats should be transparent at NBC. Clearer understanding on how targets are prioritised and investments made would be valuable. Commitments to surveillance for the range of key threats should be built around a data optimised strategy of passive vs active vs targeted surveillance and maintained and not allowed to be suspended in the face of a major incursion or outbreak. Otherwise the system limps from one episode of intense surveillance around an incursion to the next, but without ongoing surveillance for all agreed priorities..***

Recommendation 5: States and territories should utilise (or adapt) the dispute resolution process agreed by ministers in 2012 and include the key elements of that in IGAB2.

**Agreed.**

Recommendation 6: IGAB2 should clarify the roles and responsibilities of the parties with regard to international and domestic market access, including proof of area freedom.

**Agreed if needed to ensure industry and governments are clear and fully aware of responsibilities.**

### **Stronger environmental biosecurity**

***A general comment. CSIRO is strongly supportive of a greater prominence for environmental biosecurity in the national biosecurity system and the activities of NBC because of increasing impacts of invasive species on Australian environmental assets. As the architects of the Environmental and Community Biosecurity RD&E Strategy we have a vested interest to see that document progress beyond a plan to be enacted. We believe some of the recommendations below can help achieve that outcome.***

Recommendation 7: IGAB2 should include an explicit commitment by jurisdictions to support financially, decisions agreed to under NEBRA, but look to put in place systems that ensure decisions are evidence-based and transparent, in keeping with best risk management principles, and that give confidence to governments and the community that funds are being committed wisely and appropriately.

**Agreed, although need to have clarity on what constitutes “evidence”. Reinvigorating NEBRA will be crucial to a commitment to 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.

***This is an important recommendation but we note that such cross Departmental collaboration must be backed up with appropriate resourcing.***

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.

***We strongly support this direction, but note that just as in the agricultural sector where biosecurity is a shared responsibility of government and industry, the same should be applied to the wider environment. The Australian public is not the only beneficiary of healthy environments and there need to be better means to obtain cost sharing for environmental biosecurity from industries based on the risks their activities pose to environmental biosecurity. At present this happens only when***

***activities occur on parts of the national reserve system (eg Barrow Island) and needs to be broadened to all clear impacts on ecosystem services. Likewise other private and public sector interests that draw on the values of the natural environment, should be incentivised to invest in its protection. Coordinated environmental biosecurity planning and implementation is needed.***

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.

***Yes agreed, but it must have the appropriate authority and be adequately resourced to achieve anything. Under current legislative responsibilities this should sit in the Department of Agriculture & Water Resources***

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.

***Agree, noting that this committee has existed in the past, but failed to achieve broad environmental biosecurity goals. A model where environmental biosecurity is covered by other NBC committees could be more efficient if effectively planned.***

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

***While this might be one path to a clearer focus on environmental biosecurity we believe this would result in lack of clarity through mixed roles and responsibilities for PHA and AHA. All the recommendations around environmental biosecurity up to now indicates standalone entities to focus on the needs of the environment. Consequently we believe consideration should be given to establishing an EHA (Environmental Health Australia) to interface with environmental industries and the NBC.***

## **Building the national system**

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

***Yes, and this has been developing over a number of years (e.g. Weeds of National Significance) but needs clear criteria around environmental impacts as part of the process.***

Recommendation 14: The NBC should lead five-yearly national-level risk prioritisation for emerging animal, plant and environmental risks and pathways, in partnership with system participants, reporting to AGSOC and AGMIN.

***Agreed. This is a requirement for Australia's responsibilities under CBD Aichi target 9. Risk prioritisation using widely accepted and peer reviewed methodologies is crucial to generate justifiable outcomes. However, the outcomes should have a wider audience that AGSOC and AGMIN, including Environment and Health Ministers if environmental and human health consequences of biosecurity incursions are being dealt with.***

## **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.

***High level biosecurity R&I priorities have existed for many years, most recently through the National Biosecurity RD&E strategies, however getting detail at the sectorial committee level needs to be completed.***

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.

***CSIRO strongly supports the value of coordinated investment and activity in biosecurity research, but we do not believe yet another institution is required to achieve this for cross-sectoral biosecurity R&I. In our view there are existing bodies including the RDCs and also the CSIRO itself which could provide this coordination.***

***One mechanism for funding could be through an extension of the Rural R&D for Profit Program with explicit funds for cross-sectoral and environmental biosecurity research.***

***We note the focus on Innovation in the report and wish to emphasise the significant opportunities for innovation in biosecurity to enable biosecurity delivery to be a legitimate business opportunity for the private sector. "Biosecurity as a business" could take several forms from private companies conducting surveillance and assurance programs on behalf of jurisdictions, through to whole of supply chain systems with support for producers in implementing on-farm biosecurity measures through to post farm gate transport, export and handling chains. Jurisdictions and the Federal government could be innovative with legislative change and interpretation which opens up opportunity for innovation in biosecurity delivery through small to medium businesses. This may be the topic of a separate investigation.***

## **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 18: First Ministers should formally establish the NBC and articulate its Terms of Reference in the IGAB.
- 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.

***CSIRO endorses all the above Governance recommendations but encourage NBC to ensure it has the expertise necessary to support biosecurity R&I decision making.***

- Feedback request 4: The Review Panel seeks feedback on the proposed Terms of Reference for the NBC.
- 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.
- Recommendation 21: The NBC should take steps to increase its public profile and openness, including establishing a stand-alone website. The website could be maintained by, but be separate from, the Australian Government Department of Agriculture and Water Resources, and could accommodate and centralise all information on the NBC, its committees, and their activities. Key policy frameworks, agreements and reports of the NBC should be made publicly available on the site.
- Recommendation 22: AGSOC should establish and provide oversight to an independent IGAB Evaluation Program to assess and report on implementation of each jurisdictions' commitments under the IGAB. The evaluations, or a summary of them, should be made publicly available following ministerial consideration.
- Recommendation 23: The NBC should clarify core commitments of jurisdictions for use in the independent IGAB Evaluation Program to be documented in a future IGAB.
- Recommendation 24: The NBC should report annually to AGMIN on its progress of priority reform areas. The NBC's work program and annual report should be made publicly available upon ministerial consideration.
- 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.
- Recommendation 26: The NBC should convene a dedicated annual national Biosecurity Roundtable for AHA and PHA members to provide direct input to the NBC.

***CSIRO endorses all the above recommendations, but notes that the inclusion of an EHA or equivalent should be considered.***

## Funding our national system

Recommendation 27: The NBC and the Industry and Community Advisory Committee, in consultation with other key stakeholders, should revise the National Framework for Cost Sharing Biosecurity Activities to enable its practical application.

***Agreed. Consideration should be given to broadening cost sharing arrangements beyond eradication activities since this constraint can lead to sub optimal behaviours and outcomes.***

Recommendation 28: The NBC, with key industry and non-government partners, should agree uniform and fully inclusive categories of funding activity for the national biosecurity system.

***Agreed***

Recommendation 29: The IGAB should include an ongoing commitment to the funding stocktake, with governments publicly reporting their expenditure and the high-level stocktake results under uniform and fully inclusive categories.

***Agreed***

Recommendation 30: All governments should review their current biosecurity expenditure, with a view to redirecting funding into areas that return the highest yields to farmers, industry and the community. This approach will require a planned and coordinated strategy of engagement and communication.

***Agreed. A peer-reviewed risk-return framework should be applied to all biosecurity implementation and investments.***

Recommendation 31: The Risk Return Resource Allocation model should be extended to include all jurisdictions and their investments, with the Australian Government providing assistance to jurisdictions to build national capacity.

***Agreed***

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

***Agreed. There would be great value in being able to monitor where investments are being made in the biosecurity system. Extracting such information for the on-farm biosecurity sector would be challenging.***

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.

***We agree that rapid determination of the likelihood of eradication is important but question that 4 weeks is appropriate across all potential incursions. The time to make such judgements will depend in part on the biological/ ecological nature of the organism and the level of background knowledge involved. Four weeks could***

***allow for rapid delimitation surveys and a quick desktop study but may be inadequate to arrive at judgements around 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.

***Agree, but this requires very clear guidelines otherwise it could become open-ended.***

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

***Agreed***

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

***Agreed***

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.

***Disagree, in that we believe there needs to be a complete rethink about the role of State Governments and the private sector in delivering post border biosecurity outcomes. In many aspects we believe that Biosecurity delivery should be seen as a business opportunity, particularly through technology led innovation. The current recommendation would simply perpetuate a model that is not up to the task and is not leveraging all the opportunities offered by current technologies.***

### **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.

***Agree, but needs to include measures to critically assess the quality of information.***

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.

***Strongly agreed but more than an information system to allow data capture and analysis. This should not be the insurmountable problem it seems to have become. The ALA (Atlas of Living Australia) provides a model for biodiversity of how to overcome major challenges in data standards across jurisdictions, but noting the need for focus on data quality.***

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.

***Agreed***

Recommendation 39: The Australian Government should establish, within the Department of Agriculture and Water Resources, a dedicated National Biosecurity Intelligence Unit, to coordinate and provide advice to the NBC, AGSOC and AGMIN on biosecurity intelligence covering emerging risks and pathways, and international and domestic pest and disease detection.

***We support this suggestion but note that in addition to animal and plant biosecurity threats which are the realm of DAWR, such an Intelligence unit would need to span environmental biosecurity and health threats through zoonotic disease incursions. DAWR has clear responsibilities in agriculture, but an Intelligence Unit would need links there, and into Environment, Health and National Security. It might be better placed with National Security.***

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

Recommendation 40: Jurisdictions should adopt the proposed new priority reform areas and associated work program for IGAB2, and amend the IGAB in line with proposed revisions.

***Agreed.***