

Dairy Industry Submission

Intergovernmental Agreement on Biosecurity (IGAB) Review - Draft Report

The Australian dairy industry welcomes the opportunity to comment on the draft IGAB Review report prepared and released by the Review Panel.

The report is a comprehensive assessment of the IGAB signed in 2012, what has occurred since, and provides suggested directions intended to assist in delivering a more coordinated national partnership approach to biosecurity over the next five years (IGAB 2).

This submission will initially focus on some more general observations about the report and then comment on recommendations and feedback requests where relevant to the dairy industry.

General Comments

The dairy industry is in broad agreement with much of the report and the priority reform areas proposed for IGAB 2, however a number of significant issues and concerns are raised for consideration. In particular there is concern that strengthening the biosecurity partnership has not been given the priority that is needed for future success.

There are already existing partnerships between industry and government through AHA (and PHA) and this demonstrates the benefits of a more integrated industry/government approach in a number of biosecurity activities. The dairy industry value this partnership and have gained a real sense of ownership in the agreed activities. The interaction between industry and governments at the AHA Members Forum, has led to the emergence of other interactions that improve understanding and communication on biosecurity activities. These include the regular dialogue between AHA Industry Forum and the Animal Health Committee and the engagement between AHA Industry Forum, CSIRO AAHL and DAWR.

AHA and PHA Industry Members initiated a Joint Industry Biosecurity Forum in 2014, which included a combined session with members of the National Biosecurity Committee (NBC) that received encouraging feedback.

The 2015 Joint AHA/PHA Industry Forum supported the suggestion of holding an ongoing biosecurity forum with NBC, and the possibility of additional engagement with a smaller industry group at the time of NBC meetings if the need for dialogue arises.

The EADRA is another important example of the effectiveness of partnerships between industry and government. The CCEAD and NMG, enable joint input to EAD response plans and overall decision making. Agreement under EADRA includes predetermined arrangements for cost-sharing between industries and governments. In the event of an EAD outbreak, this commitment is likely to impose a significant cost burden on industries, emphasising the true nature of this partnership.

The dairy industry see this review as an opportunity to build on these partnerships through encouraging industry participation rather than creating opportunities for high level consultation and engagement.

With the animal health, welfare and biosecurity agendas already over-flowing, implementation of agreed recommendations will require resources, prioritisation and strong management. The report deals with resourcing in general terms only under the heading of funding, however specific issues and priorities will become evident when consideration is given to how various recommendations are to be implemented.

Biosecurity capability has already suffered as a result of cut-backs in government funding at the national and state levels, and this has translated into reductions in the AHA Core Program budget in real terms between 2010 and 2016.

The ADF believe that a robust biosecurity regime, from on-farm to our national borders, is fundamental if Australia is to enjoy the benefits of a dairy industry that is safe, productive and competitive in the international market. ADF encourages all farmers to invest in their on-farm biosecurity. This requires ongoing funding to provide the capability to respond to emergency diseases to safeguard the dairy industry and Australia's reputation as a safe, clean food producer. ADF considers it crucial that Animal Health Australia continues to receive adequate funding in order to deliver an effective, whole of value chain approach to biosecurity. Each dairy farmer contributes to the delivery of AHA Core and Special Programs through an animal health component of the Dairy Produce levy on milk production of 0.058cents per kg of milk fat, and 0.01385 cents per kg of protein.

In the final section of the report it is stated that *“the recommendations were devised in the context of a longer-term direction—say 10 to 15 years hence—for the national biosecurity system; a future system that might exhibit ”* a number of features and characteristics are then listed. (Review report page 99).

It is appreciated that these are not recommendations, and whilst many of these features are fully supported, there remains livestock industry opposition to the lumping together of emergency response deeds and institutional responsibilities due to the significantly different technical issues and skills required when dealing with animal health and disease preparedness and response issues compared with plant health and environmental issues.

Biosecurity stakeholders involved in the partnership have different needs and resources available and whilst aggregation of biosecurity management in an overarching sense is supported there is the need to accommodate specific industry/sectoral needs in an accountable way. The same needs to occur for environmental biosecurity, without impacting on the funding, expertise and structures that are known to be working for the livestock industries.

Specific Comments

Feedback request 1 The Review Panel seeks feedback on the draft roles and responsibilities of national biosecurity system participants.
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The dairy industry support clarification of responsibilities within the biosecurity system. All industry activities listed are supported under existing dairy industry arrangements, except for those provided by the partnership with other animal industries and governments through Animal Health Australia. This could be accommodated by the inclusion of an additional dot point to this effect within the governments and industry columns.

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.

The recommendation for an Industry and Community Advisory Committee, is dealt with under recommendation 25. The collaboration and involvement proposed in this process is strongly supported. A National Statement of Intent will need to focus on building the partnership, through a decision making partnership as exists through AHA at the moment.

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.

The dairy industry has worked cooperatively with jurisdictions in achieving and maintaining freedom from Enzootic Bovine Leucosis. As well there are commitments to EAD response arrangements and specific disease monitoring for national priority diseases.

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 within the next NBC work program.

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

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.

[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.

Supported

[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.

Accept – As an observation, the focus for environmental incursions is mainly on management rather than eradication, the latter being the priority of animal industries. The open-ended nature of funding for ongoing management of introduced diseases is seen as a public good responsibility rather than a shared responsibility.

[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.

[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.

[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.

[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.

Supported – This model is similar to the dairy industries position to establish a working partnership between NBC and the animal industries, rather than an advisory committee as proposed under recommendation 25.

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

The dairy industry has concerns that this may potentially duplicate outcomes from recommendations 10 and 11, which will ensure a specific focus on environmental issues. As well, participation by environment representatives on the NBC Biosecurity Stakeholder Advisory Committee will provide an overall interface between NBC, industry and environment representatives. AHA and PHA have responsibility and accountability to their members. It is unclear whether this recommendation is proposing a separate environment category of membership.

Dairy seek more clarity on what is intended with this recommendation as currently there is insufficient information to support.

[Recommendation 13](#) Jurisdictions should adopt a systematic approach to determine and plan for national priority animal, plant and environmental pests and diseases.

[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.

Supported

Research and Innovation

Table 1: Investments made by RDCs on biosecurity R&I

There are concerns that table 6 is misleading.

The report lists RDCs funding of biosecurity R&I in Table 6, extracted from annual reports, annual operating plans and strategic plans from 2012-2015. Biosecurity crosses many boundaries in the range of agricultural research and relevant R&I projects may be categorised under other related priorities (particularly farm profitability). Consequently data derived from these reports may not fully represent the investment in biosecurity R&I. A more reliable source of recent RDC investment has been prepared for the Rural RDC CEOs. For Dairy Australia the biosecurity RD&E investment for biosecurity in 2015-2016 was \$1,473,000 of a total RD&E expenditure of \$41,537,564 representing 3.5% of the total spend. Expenditure on biosecurity R&I occurred across a range of activities and programs provided to industry by DA, including emergency animal disease preparedness, national disease management strategies, farm biosecurity planning, the Regional Development Program (RDP's), dairy animal health and welfare webinars, numerous publications and through the DA website.

As presented table 6 is misleading, and should be removed.

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.

Agreed - R&I priorities need to be identified. It should be recognised that within existing animal biosecurity national programs there are current opportunities to identify R&I priorities for animal biosecurity and to establish co-investment including cross-sectoral biosecurity RD&E as appropriate. A similar cross-sectoral strategy is available for national plant biosecurity RD&E.

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.

The proposed options do not recognise existing arrangements for collaborative cross-sectoral biosecurity R&I such as the National Animal Biosecurity RD&E Strategy and various National Animal Health Programs coordinated by Animal Health Australia. Similar opportunities are available for

plant biosecurity. Often biosecurity activities are specific to the needs of individual sectors and frequently the activities and priorities overlap with other RD&E needs within an agriculture sector. For greatest efficiency and best outcomes these are best served by the relevant RDC. Dairy is concerned that establishing another institution responsible for biosecurity R&I is likely to result in duplication of activity. Environmental and cross-sectoral R&I can be accommodated within existing co-operation and frameworks.

[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.

Supported

[Feedback request 4](#) The Review Panel seeks feedback on the proposed Terms of Reference for the NBC.

The Term of Reference make no reference to the biosecurity partnership, industry participation and engagement with biosecurity stakeholders

Suggested additional dot point along the following lines

- Fostering a national partnership approach to biosecurity, through comprehensive engagement with industry and stakeholders

[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.

The text relating to this recommendation additionally recommends:

To reflect these changes, and give a deliberate biosecurity focus to the NBC and its sectoral committees, the Panel is suggesting a revised Animal Biosecurity Committee (ABC), renaming

the Animal Health Committee, and a revised Plant Biosecurity Committee (PBC), renaming the Plant Health Committee

Dairy is aware of the significant number of agenda items already dealt with at AHC, and recognises the value of the animal health focus on matters of importance to animal well-being and market access. The major concern held with aggregating animal health (and animal welfare), with other biosecurity matters will impact significantly on this focus. AHC is successful because of the specialist involvement from each jurisdiction and its interface with the AHA Industry Forum which has dairy industry support.

The dairy industry oppose the replacement of the AHC with an ABC.

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.

These are predominantly operational and governance matters of relevance to governments. Dairy do question the purpose, cost, value and accessibility of a stand-alone website.

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.

Supported

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.

This recommendation does not go far towards achieving a national biosecurity working partnership approach, nor does it reflect the needed cultural shift referred to in S2.4 of the report. It is

acknowledged that the sheer number of stakeholder groups, presents an enormous challenge in achieving effective communications and engagement. The annual forum between NBC, AHA and PHA Members (recommendation 26) will present an additional opportunity for agricultural industries, however for many it will be like being in the stands as an observer, rather than being part of a functional biosecurity partnership.

Dairy strongly encourage the Review Panel to reconsider this recommendation and to use this opportunity to firmly establish biosecurity as a true partnership between governments and industry. Such a framework could be modelled on the AHA partnership and utilise existing industry biosecurity arrangements such as the AHA Industry Forum along the lines outlined under General Comments on page 1 of this submission.

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

Dairy does not oppose this recommendation however believes that there is a need for a fundamental shift to providing a working biosecurity partnership between governments and industry along the lines covered earlier.

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.

The issues or concerns leading to the recommendation are not clear in the text, which gives rise to caution.

The Review Panel recognises that there is a need for an agreed framework or model to guide the application of cost sharing arrangements to biosecurity activities by all parties. However, the framework does not provide sufficient guidance to facilitate practical implementation by system participants; is somewhat arbitrary on potential funding mechanisms (for example, a national biosecurity levy); and, to date, reflects a government-only view of cost sharing. There would be benefit in the NBC and the proposed new Industry and Community Advisory Committee revising the framework, in consultation with key stakeholders, with a view to its practical application to system participants.

Engagement of key stakeholders is critical in cost sharing considerations, and the recommendation is supported. Further consideration needs to be given to engaging these stakeholders in a decision-making partnership.

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.

It is not clear from the text what is meant by the terminology – uniform and fully inclusive categories of funding activity. Dairy support the suggestion that would enable “*system participants beyond*

jurisdictions to categorise their contributions to and participation in the system” but seeks further elaboration on the terminology used in the recommendation.

- [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.
- [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.
- [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.

Supported

- [Recommendation 32](#) AHA and PHA should coordinate an industry stocktake of national biosecurity system investments, making the results publicly available.

Supported

- [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.

Dairy is concerned that the imperative in an animal disease incursion is to act quickly. For agreed serious incursions the priority is to implement an eradication plan ASAP (e.g. FMD). An extended or four week delay would make most livestock disease incursions non-eradicable.

The agreed response framework is best determined during peacetime without the pressures of dealing with the outbreak. To introduce a further element into the timing equation following an incursion is regarded as inappropriate and opposed by dairy.

This is also a matter already dealt with in the deeds and there are existing deed review measures available if a party to the deed has concerns they are not working effectively. The concern can be raised at the annual EADRA Workshop or during a five year review of the operation of the deed, and dealt with by deed signatories.

The dairy industry oppose both proposals.

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

With regard to the exotic production weed deed, there has been one workshop to date and there is yet to be a formal proposal for consultation with industry. There is already a level of concern that this is about cost-shifting from government to industry. Irrespective of whether this is true or not, to hope to gain support without adequate engagement will result in suspicion and most likely failure. Consultation and engagement will need to involve national and state farmer bodies.

This task of deed proposal development and subsequent consultations is in process and this recommendation is not supported.

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.

Distortions exist between states due to differing levels of cost recovery and charges. There is also significant community benefit derived from viable food and fibre industries in the national economy. A focus on levies rates/charges must recognise where public good exists including where this results from industry activity benefiting the broader community.

Supported

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.

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.

[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.

[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.

Supported

[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.

Supported when agreement has been reached.