

The Grains Research and Development Corporation submission on the Draft Intergovernmental Agreement on Biosecurity report

Introduction

The Grains Research and Development Corporation (GRDC) conducts RD&E on behalf of 25 levy paying industries comprised of wheat; coarse grains—barley, oats, sorghum, maize, triticale, millets/panicums, cereal rye and canary seed; pulses—lupins, field peas, chickpeas, faba beans, vetch, peanuts, mung beans, navy beans, pigeon peas, cowpeas and lentils; and oilseeds—canola, sunflower, soybean, safflower and linseed.

The GRDC has invested \$40M in plant biosecurity, over the life of the two Plant Biosecurity CRC's, with \$22M directly in the Plant Biosecurity CRC (PBCRC). Currently the GRDC investments in biosecurity projects on surveillance, capacity, and preparedness are worth over \$5-\$6M annually of which \$2M is invested with the PBCRC. Further, the GRDC responds to endemic disease outbreaks (e.g. Beet Western Yellows Virus) and exotic incursions such as Russian wheat aphid with additional resources. Current Project investments include preparedness for exotic incursions such karnal bunt, wheat blast and emergency permits for a number of high priority pests. It should be noted that our research partners in State agencies, Universities and the CSIRO, generally match the GRDC investment.

National Biosecurity Framework

The current biosecurity framework has a discontinuous pest prioritisation and funding process, due to having no formal linkages between the RDC's and Government Biosecurity decision making apart from PHA / AHA being observers on some committee (Draft IGAB report figure 6). Industry peak bodies particularly signatories to the Exotic Plant Pest Response Deed (EPPRD), have a conjugate to this process through Plant Health Australia. While some RDC's (including grains) are represented on various Governmental biosecurity committees, this is not a formal inclusion into the biosecurity framework.

In the GRDC response to the AFI position paper (Keogh and Goucher, 2016) on the future of biosecurity RD&E, GRDC indicated that the current framework biosecurity is capable of conducting biosecurity RD&E in the absence of the current PBCRC or a permanent biosecurity RD&E entity. The plant based RDC position paper (Clayton-Green 2016) also stated that the current biosecurity framework with some adjustments could provide a sustainable coordinated biosecurity RD&E. The main area that required adjustment were the need for the interaction of the RDC's directly with the National Biosecurity Council to improve co-ordination and co funding. A proposed structure with the plant based RDC having a RDC biosecurity committee to interact formally with the biosecurity framework (figure 1). The plant based RDC's have implemented such a process late last year. The proposed revised IGAB Governance structure also provide similar buy in for the RDC (draft IGAB report figure 7)

In both the draft IGAB report and the Clayton Green report, have stated that the National plant biosecurity RD&E implementation committee has no authority to prioritise RD&E or has funding to direct such RD&E. The plant based RDC proposed structure having formal interaction with the NPBRC will allow for both the structure and funding to be clearly articulated and clearly articulated.

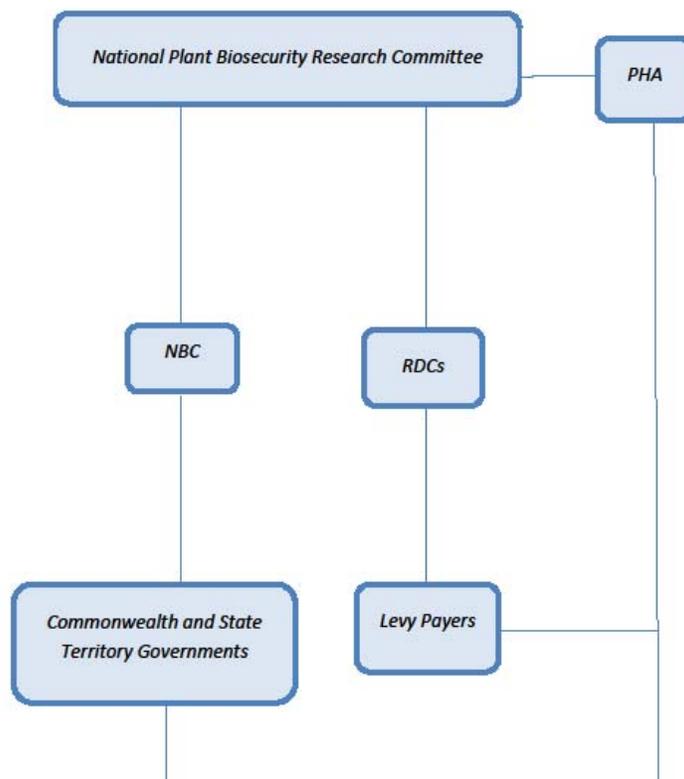


Figure 1 A model whereby plant based RDCs would work directly with NBC members to align and co-ordinate areas of common interest. (Source Clayton-Greene, 2016)

Future Biosecurity RD&E and funding

The options for maintenance of a future biosecurity RD&E put forward in the draft IGAB paper are not supported by the GRDC. Option 1, having an permanent stand-alone entity for cross sectorial RD&E which includes the scientific and technical staff, is not supported as it will be duplicating and undermining current research providers in the State agencies, CSIRO and Universities working on sectorial biosecurity including environment biosecurity. Other plant based RDC's and their industry bodies do not support the creation of a new biosecurity R,D&E body. Secondly, both of the proposed funding options are not required if there is adoption of the plant based RDC model above. The resources required to demonstrate the value of directing Commonwealth matching funding from an industry to cross-sectorial RD&E would be an inefficient use of those funds. This is counter to the reviews panel belief that it would be cost efficient. Additionally this use of directing matching funds

doesn't provide funding for environmental biosecurity and area deemed most lacking in the draft IGAB review. Option 2 is not supported, as it is not required, as during the time of this review the plant based RDC's have implemented a process so identify and prioritise investment in cross-sectorial biosecurity. The plant based RDC's have demonstrated that they are capable of coordinating cross-sectorial biosecurity RD&E through the recent SMART surveillance application by all 7 plant based RDC to the Rural R&D for profit funding scheme.

The draft IGAB report suggests that investment by RDC's in biosecurity has been short term. As indicated in the introduction the GRDC has invested over \$40 million over the last 10 years into biosecurity. The GRDC has recently entered into bilateral agreements with our research partners listed as leads in the Grains National RD&E strategy to maintain capacity, capability and excellence with our RD&E partners (Curtin University, Victorian Department of Economic Development, Jobs, Transport and Resources, South Australian Research and Development Institute, and NSW Department of Agriculture). This type of arrangement should be encourage across all industry and community sectors rather than imposing taxes or allocating levies away from intended industries. For environmental biosecurity, this would be a role of the intergovernmental agreement to provide the long-term commitment from Governments.

With incursions increasing (IGAB figure 2) and some recent incursion that directly affect grain growers, the GRDC is likely to invest more in pre-incursion strategies and incursion preparedness. Where pests or methods are cross-sectorial, the GRDC will look to partner with other RDC's to achieve efficiencies in RD&E effort.

Surveillance and technology

It is the view of the GRDC that surveillance is an area that can be improved and has good cross-sectorial benefit not only where there are the same or similar pests but also in the use of resources (people and equipment) during the different growing season of different production sectors. The grains industry is generally has an offset season to other sectors, which will allow for greater utilisation of resources particularly in the Mediterranean like agricultural regions of Australia.

The GRDC is of the opinion that the sustainability of general surveillance needs to show value to growers through information on their endemic pests but have the capacity to detect exotic pests. This later capability can be used for area freedom but also early warning and limiting incursion spread. The grains industry is increasing its capacity in general surveillance with Schwartz (2015) stating that there are 136 industry surveillance programs in place in the grains and horticulture industries, with 88 of these in the grains industry. Where general surveillance has been set up only for exotic species, that surveillance system has not been sustainable with examples in Europe, UK and New Zealand and is an inefficient use of resources.

Technology will have a large part of future surveillance activities – from remote sensing to faster diagnostics. The GRDC with our research partners is investing into technology – such molecular diagnostics, robotics, SMART sensing for pests, disease and weeds (image, pheromone, molecular), and greater utilisation of large data sets (big data) to improve grains management of biotic threats.

GRDC responses to the draft IGAB Feedback and recommendations

Feedback request 1 The Review Panel seeks feedback on the draft roles and responsibilities of national biosecurity system participants.

The GRDC is in general support of the roles and responsibilities proposed by the draft IGAB report. The grains industry is currently meeting these roles and responsibilities.

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 GRDC supports recommendation 1 but with the need to consider separate committees for industry and community and give due consideration to the model proposed by the plant based RDC’s

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.

The GRDC doesn’t has access to data on the total effort and cost associated with demonstrating area freedom

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.

The GRDC supports this recommendation

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

The GRDC supports this recommendation

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

The GRDC supports this recommendation

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.

The GRDC provides no comment

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.

The GRDC supports this recommendation

Stronger environmental biosecurity

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.

The GRDC provides no comment

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.

The GRDC supports this recommendation

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.

- The GRDC provides no comment

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.

The GRDC provides no comment

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.

The GRDC supports this recommendation and suggests that this committee identifies where agricultural and environmental investment can be co-funded for improved efficiencies. In order for this involvement with the RDC biosecurity committee would be beneficial

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 GRDC supports this recommendation as long as this broaden of their roles is funded from the environmental sector or public good funding.

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.

The GRDC supports this recommendation if the process above has more involvement with industry including the RDC's and the community

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.

The GRDC supports this recommendation

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.

The GRDC supports this recommendation

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.

As indicated earlier in this submission the GRDC does not support the options put forward in the draft IGAB review. The plant based RDC's have put forward an alternative mechanism for plant biosecurity which could be widened to encompass animal biosecurity and weeds.

Strengthening governance

Recommendation 16 A future IGAB should remain an agreement between the First Ministers of the Australian, state and territory governments.

The GRDC supports this recommendation

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.

The GRDC provides no comment

Recommendation 18 First Ministers should formally establish the NBC and articulate its Terms of Reference in the IGAB.

The GRDC provides no comment

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.

The GRDC provides no comment

Feedback request 4 The Review Panel seeks feedback on the proposed Terms of Reference for the NBC.

The GRDC provides no comment

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 GRDC provides no comment

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.

The GRDC support this recommendation, as currently only those involved directly with biosecurity are aware of NBC and its committees

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.

The GRDC provides no comment

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.

The GRDC provides no comment

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.

The GRDC supports this recommendation of having a more open and transparent reporting system

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.

The GRDC supports this recommendation but suggest that there may be a need for separate industry and community committees

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

The GRDC supports this recommendation

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.

The GRDC provides no comment

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.

The GRDC provides no comment

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.

The GRDC supports this recommendation of having a more open and transparent reporting system

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.

The GRDC supports this recommendation and suggests that Governments include industry (peak industry body and relevant RDC) in this process

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.

The GRDC provides no comment

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

The GRDC supports this recommendation of having a more open and transparent reporting system

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.

The GRDC provides no comment on the funding arrangements but agrees that a more rapid response to exotic pest or disease incursion is warranted. Additionally, where an incursion is deemed not to be able to be eradicated or contained and is moved to management an earlier transition period is required for the affected industry and its associated RDC are able to respond to this additional resource requirement. It is suggested that the relevant RDC is invited as a confidential observer into either the technical working group or the National Management group for an incursion

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

The GRDC supports this recommendation

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

The GRDC supports this recommendation of having a more open and transparent reporting system

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.

The GRDC provides no comment

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.

The GRDC supports this recommendation where this framework and performance is publically available

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.

The GRDC supports this recommendation

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.

The GRDC supports this recommendation

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.

The GRDC supports this recommendation

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.

The GRDC reserves its support until the final report and its recommendations are provided

References:

Keogh and Goucher, 2016. Australian Farm Institute August 2016. A sustainable and nationally coordinated plant biosecurity R,D&E system for Australia, a research report.

Clayton-Green, K 2016. A National Plant Biosecurity R,D&E System: A position paper for the plant based RDCs.

Schwartz Consulting October 2015. Analysis of plant pest preparedness capability: a report to the Department of Agriculture and Water Resources