

# Northern Territory Government Submission—Intergovernmental Agreement on Biosecurity Review.

## Summary:

The Northern Territory Government (NTG) welcome the opportunity to comment on the Intergovernmental Agreement on Biosecurity (IGAB) Review Draft Report and agree that Australia's biosecurity system underpins Australia's \$98 billion in agricultural production and exports, \$38 billion in tourism and contributes to maintaining our unique, biodiverse, natural environments.

NTG supports the panels assessment that the IGAB has created a framework for governments to coordinate and identify priority areas of reform and action to build a stronger and more effective national biosecurity system and recognises its significant achievements, including a strong and healthy working partnership between all governments and the development of sound national policy principles and frameworks for an effective and well-regarded system. The NTG notes the opportunities for the Australian Government to provide leadership in critical risk areas.

The Review Panel's Draft Report is built around a central theme that governments and industry/community should adopt a systematic approach to determining and planning for national priority animal, plant and environmental pests and diseases. NTG agrees with this concept but disagrees that this is best achieved by analysing pest by pest, disease by disease. NTG support a systems approach where diseases and pests are clustered according to their epidemiology and that the risks are managed accordingly by analysing pest and disease trends, distribution and priority pathways. A large amount of work has been undertaken by Animal Health Committee (AHC) in 2012 and Plant Health Committee (PHC) in 2016 to achieve this outcome, NTG agree there is significantly more work to do in the environmental sector and that there is still a significant amount of activity to further refine the animal and plant sector activities that have been undertaken, including pests and disease profiles and response arrangement for high priority pests and diseases.

The Review proposes a specific process to profile and plan for each national priority pest and disease, inclusive of the parties involved and funding required. This is a sound concept and is resource intensive. The AusVetplan which informs the animal health priority pests and diseases has largely adopted this principle and subject to resources would be a worthy addition to the Plant plan manual noting that the ability to forecast plant pests and diseases due to the sheer diversity and number of pests has made this difficult to undertake. To address this in the environmental sector would be extremely complex.

NTG notes the review panel's assessment that implementation of the draft recommendations will increase the cost of the national system, but the cost of no additional action was viewed as unacceptable.

NTG notes there are provisions in place for managing an emergency response to an incursion, NTG have experience of significant delays while the technical feasibility of eradication and the collation of adequate data to inform this decision are collected. This leaves jurisdictions bearing significant costs and legal risk until the outcome is determined. The impact on the relationship between government and industry in these circumstances is significant. NTG agree an alternative arrangement is desirable however note the arrangements under the deeds are by necessity rigorous to ensure appropriate use of resources and repeatability of decision making.

NTG notes the review panel's advice that Governments review their own cost recovery arrangements and that national or locally there is potential for property-based levies to contribute further to funding the national system.

NTG support that research and innovation (R&I) underpins Australia's science-based approach to biosecurity and support the criticality of research, noting that NT is largely dependent on R and I across Australia and internationally to inform best biosecurity practise locally.

NT's Report Submission cover sheet and Response—Intergovernmental Agreement on Biosecurity Review

The NTG agree with the panel's findings that the principle of 'shared responsibility' remains divisive for a number of stakeholders and support the proposed National Statement of Intent to outline a common and unifying approach to biosecurity for all system participants. NTG notes that market access and social amenity are two key drivers for shared responsibility that resonate with industry and community stakeholders that should be used to focus and communicate biosecurity engagement. Apart from the development of a national statement of intent, the important area of communication and engagement (2.4) has not benefited from any recommendations.

NTG note the panels concerns of the adequacy of the national system in addressing biosecurity risks impacting biodiversity and the environment. NTG agree that to make significant improvement Environment Agencies and stakeholders must have a direct role in national biosecurity policy and response arrangements where the primary impact of a newly introduced pest is environmental.

NTG Agree with the panels assessment of the need for a refreshed IGAB to ensure robust national biosecurity arrangements and supports this being a Governmental Agreement with an Industry subcommittee forming part of the governance arrangements. NTG have concerns of the disbandment of the Invasive Pest and Animals Committee (IPAC) that is proposed to be rolled up into a new Environmental Biosecurity Committee. NTG has concerns that the diversity of the biosecurity agenda in the Environmental sector would detract from the focus and progress the IPAC have been able to achieve for weeds of national significance and Invasive vertebrates.

NTG remain concerned the agenda of an EBC would be so broad little action could be achieved and suggest that if an EBC was formed the IPAC and Marine Pest Committee (MPC) remain as sub committees at least in the interim to enable sustained action while the EBC generate momentum and focuses on gaps in the system.

NTG supports the IGAB continuing as an Agreement of First Ministers to ensure a strong whole-of-government mandate and advancement of the national biosecurity agenda. The NTG however is concerned about the level of resources available to achieve the desired outcomes and highlight that smaller jurisdiction are at considerable disadvantage to resource the key foundation elements of the IGAB including information systems, databases, emergency response capacity and legislative and policy reform that have equivalent obligations and resource investment regardless of the size of the jurisdiction.

NTG has provided comment against the Review Panel's Draft Report 40 draft recommendations aimed at strengthening the national biosecurity system.

## Northern Territory Draft Submission—Intergovernmental Agreement on Biosecurity Review.

Draft recommendations and requests for feedback	NT Response/Comments
<b>Knowing and owning our roles and responsibilities</b>	
<p><u>Feedback request</u> <u>1</u></p> <p>The Review Panel seeks feedback on the draft roles and responsibilities of national biosecurity system participants.</p>	<p>Shared responsibility is one of the IGAB’s core principles and means everyone takes responsibility for biosecurity matters under their control.</p> <p>The animal and plant emergency response deeds are founded on shared responsibility, and provide strong evidence of the benefits that come from a partnership approach. However the NTG believe shared responsibility as a concept has not been broadly accepted by participants across the national biosecurity system.</p> <p>NTG agree the language of risk creators and risk beneficiaries has not been successful and it may be better to recognise all stakeholders that interact with the system as participants. This would not preclude the principles of risk creators and beneficiaries being applied in any costs recovery mechanism.</p> <p>The defining of roles and responsibilities while important can also be as divisive. For instance the Commonwealth do not see response obligations as part of their current responsibility, however operational branches such as the Northern Australian Quarantine Strategy (NAQS) is a well-resourced operational arm very well placed to be part of response arrangements in the north of Australia.</p> <p>Articulating a static set of roles and responsibilities will entrench that silo approach unless the roles are broad and all encompassing.</p> <p>Therefore while NTG support it is desirable to have better clarity of roles and responsibilities it is not supportive of lists that preclude a true shared responsibility approach.</p> <p>Additionally the NTG note</p> <ul style="list-style-type: none"> <li>• The definition of ‘pest’ appears to include weeds; however in some circumstances weeds are expressly mentioned. The NTG recommend the term pest is used.</li> <li>• All stakeholders under take surveillance</li> <li>• R and I should be added to the shared responsibility.</li> </ul>

<p><u>Recommendation 1</u></p>	<p>The NBC and the proposed Industry and Community Advisory Committee, should lead the development of a draft National Statement of Intent for public consultation that outlines:</p> <ul style="list-style-type: none"> <li>• a vision, goal and objectives for the national biosecurity system</li> <li>• principles for managing biosecurity</li> <li>• the meaning and application of ‘shared responsibility’</li> <li>• the roles, responsibilities and commitments of participants, including accountability measures</li> <li>• governance arrangements for the national biosecurity system.</li> </ul>	<p>NTG Agree.</p> <p>This is a worthwhile exercise but one in which it will be difficult to engage and meet the needs of very diverse stakeholders.</p> <p>The development of ‘accountability measures’ is worthwhile for monitoring, evaluation and reporting. This has proven to be a difficult task in all sectors and would require significant resourcing.</p> <p>It is noted that the draft recommendations are written using passive language, appropriate for proposals. It is hoped that the discussions are framed in the light of ‘must’ replacing ‘should’ except where the outcome is contingent on important variables.</p>
<b>Market access is key</b>		
<p><u>Feedback request 2</u></p>	<p>The Review Panel seeks feedback on the total effort and costs associated with demonstrating area freedom by jurisdictions, and the value of that trade.</p>	<p>NTG support minimising internal border measures but agree to the recognition of regional differences where there is a strong, scientific evidence of freedom.</p> <p>The concept to establish zones of area freedom from pests and diseases is highly valued by primary producers and is largely based on absence of evidence rather than evidence of absence. To provide the required rigor to claim area freedom would require significantly more resources that is currently applied to the biosecurity system and would unlikely provide significant costs benefit unless there is a natural barrier (distance /isolation) that is minimising risk of spread. Alternatively the concept of compartments is used extensively in some countries where product is traded under a HACPP arrangement with a biosecurity shield around the business. Modelling of animal movements has shown a natural barrier and therefore minimising of risk of livestock traded to WA. However modelling has also shown there are few opportunities to implement zoning in a biosecurity outbreak.</p> <p>In the NT the National Plant and Animal Health Surveillance Programs conduct surveillance for a multitude of pests and diseases which are exotic or are under eradication. However area freedom for established pests and range extension of these pests is resource intensive and would require significant industry participation with likely little benefit in respect to enhanced markets. Sector specific surveillance for particular pest or diseases ie cattle, mangos etc may be beneficial but would require industry consultation of the benefit.</p>
<p><u>Recommendation 2</u></p>	<p>The Primary Industries Technical Market Access and Trade Development Task Group (PITMATD), 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</p>	<p>NTG Agree.</p> <p>Industry is seeking greater input into market access decisions by the Australian Government. NTG supports the PITMATD enhancing engagement with industry sectors.</p>

	carefully weighed against its level of risk to trade activities.	
<u>Recommendation 3</u>	IGAB2 should strengthen consideration of market access requirements within the next NBC work program.	NTG Agree. Examples of non-compliance with importing countries requirements include the 2016 suspension of live cattle exports to Japan and cause significant economic and reputational harm. NTG Agree the national biosecurity system should be focussed on supporting market access. Industry sectors have a critical role to play in encouraging the use of best practise management systems, to minimise the threat of loss of reputation and credibility, and potentially being shut out of an export market.
<u>Recommendation 4</u>	Jurisdictions’ biosecurity surveillance activities should include pests and diseases that pose the greatest threat to our export markets.	NTG Agree. There may need to be some reprioritisation of national priorities to address jurisdictional risks. The Northern Australian Quarantine Strategy (NAQS) is about to embark on this exercise for northern Australia. The National Plant Health Surveillance Program which targets 42 priority pests is the most targeted effort for plant pest surveillance in Plant Biosecurity in Australia. Jurisdictions that have greater capacity and resourcing have a better ability to leverage additional funding internally and externally for additional surveillance activities via CRCs and industry. The Northern Australia whitepaper funding will provide opportunity to better target effort by working with more mature industries (Mango, Banana, Melon and Citrus) but again depends heavily on existing capacity and experience of the biosecurity agency to deliver outcomes.
<u>Recommendation 5</u>	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.	NTG Agree. NTG agree that states and territories should have appropriate dispute resolution processes noting that most domestic trade disputes are long standing and concern plant products. Science based decision making should be adopted.  NTG agrees with the IGAB principle that when trading goods across state and regional boundaries that government apply the least trade restrictive and scientifically-based measures to mitigate risks to the economy, environment and community.  NTG does not agree that an expansion of the Interstate Certification Assurance Scheme (ICAS) which is currently only plant based would bring added rigor. The NTG notes that most of the issues raised to the panel were plant based and are already within the ICAS system. NTG are unaware of any Livestock based interstate trade disputes.  NTG notes the Nursery and Garden Industry Australia (NGIA) comments that “our national biosecurity system is exposed to fundamental risks due to an increasingly complex and costly domestic market access system and the

		<p>threat of non-compliance is increasing as government fail to fund plant biosecurity at adequate and appropriate base levels particularly in recognition of the public good".</p> <p>NTG therefore does not support expanding the ICAC.</p>
<p><u>Recommendation 6</u></p>	<p>IGAB2 should clarify the roles and responsibilities of the parties with regard to international and domestic market access, including proof of area freedom.</p>	<p>NTG Agree.</p> <p>NTG notes that the effort required achieving and providing proof of freedom for the eradication of a pest needs to be resourced in nationally cost shared eradication programs to prevent failure and threatening the investment to date. NTG notes that in eradicating a pest or diseases the elimination of the first 99% of a target population can cost less than eliminating the last 1%.</p>
<b>Stronger environmental biosecurity</b>		
<p><u>Recommendation 7</u></p>	<p>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.</p>	<p>NTG support this recommendation noting that environmental biosecurity efforts are generally viewed as public good activities and are left to government to fund and implement. While primary industries often have taken responsibility for environmental biosecurity responses they have little or no technical expertise in the pests or diseases and little ability to undertake risk identification to support decision-making. Primary Industry has received no additional funding and currently fund environmental biosecurity from within existing budgets.</p> <p>NTG notes that recently environmental biosecurity has dominated the emergency response efforts, particularly in relation to incursions of various tramp ants.</p> <p>NTG Agrees that despite these challenges delays in funding decisions can cause impact eradication and containment efforts.</p>
<p><u>Recommendation 8</u></p>	<p>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.</p>	<p>NTG agree that an enhanced commitment to environmental biosecurity especially in relation to NEBRA responses is required due to the significant number of environmental incursions</p> <p>NTG notes ongoing stakeholder concerns about the effectiveness of existing national arrangements to address environmental biosecurity risks. NTG supports a MOU between the agricultural and environmental agencies.</p>

<p><u>Recommendation 9</u></p>	<p>The IGAB should make clearer commitments to environmental biosecurity and include:</p> <ul style="list-style-type: none"> <li>• the principle of ecologically sustainable development</li> <li>• acknowledgement of Australia's international responsibilities under the Convention on Biological Diversity</li> <li>• a program of work to determine, plan and prepare for national priority pests and diseases impacting the environment and native species</li> <li>• a focus on environment and community as well as industry partnerships</li> <li>• invertebrate transmitted diseases as well as animal diseases.</li> </ul>	<p>NTG agree that there needs a clearer mandate for environmental biosecurity and this may be able to be articulated within a formal MOU.</p> <p>NTG have concerns about emergency response arrangements for environmental pests and diseases noting that the National Environmental Biosecurity Response Agreement (NEBRA) has been triggered on 5 occasions to date primarily for tramp ants. The NEBRA is only triggered if it is deemed technically feasible to eradicate a pest. Environmental agencies are more concerned with containing pests and diseases that may impact the environment and social amenity long term. Therefore NTG suggests that a Deed like arrangement for the containment of important pests and diseases should be investigated. This is likely to be activated frequently and would require an alternative mechanism for funding that captures beneficiaries across the whole community.</p> <p>This alternative approach is in recognition that governments are likely liable for any long term containment of pests and diseases significantly impacting our diverse ecosystems.</p> <p>The focus in environment and community partnerships and industry partnerships will require a well-planned communication strategy to deliver the desired outcomes.</p>
<p><u>Recommendation 10</u></p>	<p>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.</p>	<p>NTG have concerns that this may not be the panacea that the panel implies.</p> <p>NTG agree that change is required and support a trial of this position, NTG have concerns this will be a figurehead with little ability to influence and no legislative responsibility.</p> <p>NTG would need more detail of how this position would work and what responsibility it would have before NTG could make a decision if it would be of benefit and bring the culture change required.</p> <p>Environmental departments need to bring technical skills and risk based decision making to inform the national process. If the CEBO had carriage of this area and deployed staff to assist in responses then there would be benefit in the role.</p> <p>NTG notes that jurisdictions have stated that past attempts to treat environment issues as a separate stream under the NBC but consider this approach inefficient and duplicative. Additionally, some have highlighted that the environment also benefits from the broader system efforts (pre-border, border measures and surveillance). NTG notes that non-government stakeholders continue to view the arrangements for environmental biosecurity as immature, <i>ad hoc</i> and underfunded at all points in the system.</p>

<p><u>Recommendation 11</u></p>	<p>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.</p>	<p>NTG have concerns that this may improve Environmental biosecurity but be detrimental to the biosecurity policy arrangements of both the current sectoral committees; Marine Pest Committee and Invasive Pest and Animals Committee; both of which add considerable rigor to the national biosecurity framework.</p> <p>NTG notes that biodiversity and agricultural impacts of established pests and diseases (including weeds and freshwater pests) are handled by the IPAC and MPC deals with non-production risks and incursions of marine environmental pests.</p> <p>Both Animal Health Committee and Plant Health Committee deal with diseases impacting native wildlife and aquatic (production) animals and tramp ants respectively. NTG believe to have appropriately skilled technical experts on a committee to deal with all of these issues is not possible and therefore suggest a EBC with subcommittees that focus on marines, invasive and diversity respectively. The EBC would need to feed into other biosecurity committees particularly with respect to Market Access. Environmental pests themselves may not be viewed as trade restrictive but the impacts of them can be in light of the treatments required to control or eradicate the pest and then causing issues with registration of chemicals, residues and withholding periods for agricultural products. NTG notes that NBC is not a Committee with independent resources, therefore it would need to be a recommendation of the Panel to the Commonwealth</p>
<p><u>Recommendation 12</u></p>	<p>Greater and explicit roles should be developed for AHA and PHA in environmental biosecurity, instituted through amended constitutions and expanded board expertise.</p>	<p>NTG disagree, this approach would be a significant diversion for Plant Health Australia (PHA) and Animal Health Australia (AHA) current stakeholders and would be unlikely to add value to the companies. NTG believe an alternative approach could be a separate environmental company and the merging of PHA and AHA as a primary production focused company.</p> <p>Funding an environmental company may be problematic but funds could be drawn from the whole community as beneficiaries and is likely to attract donations from the community</p>
<p><b>Building the National system</b></p>		
<p><u>Recommendation 13</u></p>	<p>Jurisdictions should adopt a systematic approach to determine and plan for national priority animal, plant and environmental pests and diseases.</p>	<p>NTG notes this is already an area led nationally through national sectoral committees and note this approach enhances efficiencies of effort and maximises use of resources</p> <p>NTG rely on nationally coordinated technical assessment to determine priorities and develop national plans. NTG agrees this area would benefit from enhanced leadership from the Commonwealth in this critical activity. NTG welcomes a coordinated national effort and notes that resources may have to be applied to achieve this outcome.</p>

<p><u>Recommendation 14</u></p>	<p>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.</p>	<p>NTG does not agree that a five yearly review is a useful activity noting that for a number of priority diseases that emerge internationally a five year timeframe would be too slow to meet international standards and priorities. Equally a review for disease that has not changed in the five years would be a waste of resources. NTG supports the continual scanning of new and emerging disease that have international and market prioritisation to ensure the Australian pest and disease lists remain contemporary.</p> <p>It is noted that other countries such as the UK do useful risk assessments which can be part of the data mining that inform the process.</p> <p>Both the Animal Health and Plant Health Committee Surveillance strategies adopt these principles <a href="http://www.agriculture.gov.au/animal/health/surveillance-diagnostics">http://www.agriculture.gov.au/animal/health/surveillance-diagnostics</a></p>
<b>Research and innovation</b>		
<p><u>Recommendation 15</u></p>	<p>The sectoral committees of the NBC, with the endorsement of the NBC, should develop an agreed set of National Biosecurity R&amp;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.</p>	<p>NTG notes that R and I needs have been collated by AHC in 2015, but not really prioritised. The method of prioritisation needs to be transparent. The diverse nature of research funding in Australia makes realisation of any prioritisation problematic.</p> <p>Understanding pest biology and behaviour in the Australian environment is imperative to develop sustainable control measures (chemical control/managed production etc). Ongoing investment in R&amp;I is essential to achieve this.</p> <p>Coordination of the national spend on R and I is problematic with organisations both government and universities and CRC bidding against each other. The recognition of national leaders in certain biosecurity fields as undertaken in the livestock and plant R and D area would enhance agreed priorities and maximise efficiency of investment.</p>
<p><u>Feedback request 3</u></p>	<p>The Review Panel seeks feedback on the following options for a new entity for cross-sectoral biosecurity R&amp;I:  Option 1: Establishing a new stand-alone entity for cross-sectoral biosecurity R&amp;I.  Option 2: Addressing cross-sectoral biosecurity R&amp;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.</p>	<p>The NT agrees better leadership of biosecurity R&amp;I is desirable but may be difficult to achieve.</p> <p>The NT notes that the National Animal Biosecurity RD&amp;E strategy of the National Primary Industries Research, Development and Extension Framework managed by AHA has been slow to form but enables all RD&amp;E providers to confer. A parallel Plant Biosecurity RD&amp;E Strategy managed by PHA had similar issues. A key issue for the RD&amp;E strategies is the lack of new funding and the belief that economies and efficiencies would be achieved in research delivery. Whilst these strategies have questionable value in terms of management of research investment the question must also be asked about their intended life span.</p> <p>Option one is favoured. It is agreed that there are some gaps across the sectors but establishing another organisation for cross-sectoral R &amp;I will require a clear cost-benefit and a clear mandate to justify additional</p>

		<p>funding. The definition/ TOR of 'cross-sectoral' needs to be agreed by the sectors.</p> <p>A cross-sectoral biosecurity R&amp;I provider should be funded generously by the Australian government reflecting the public good value proposition. The international visitor levy is a good idea to target a risk creator.</p> <p>If an RDC is to be chosen to fill some of the gaps in cross sectoral R&amp;I, then the Rural Industries RDC with an expanded mandate is probably most appropriate.</p> <p>Another option is for the Australian Government to administer top up funding for agreed cross sectoral R&amp;I performed by an existing organisation. The RRD4P FMD project is an example of competitive leveraging that will achieve useful cross sectoral biosecurity outcomes</p>
<b>Strengthening governance</b>		
<u>Recommendation 16</u>	A future IGAB should remain an agreement between the First Ministers of the Australian, state and territory governments.	NTG agrees.
<u>Recommendation 17</u>	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.	<p>NTG agrees.</p> <p>This is apparent for biosecurity response but not necessarily all other aspects of the biosecurity system. Australian Government MOU development between agriculture and environmental agencies would assist local MOU development in the NT.</p>
<u>Recommendation 18</u>	First Ministers should formally establish the NBC and articulate its Terms of Reference in the IGAB.	NTG agrees, noting that NBC should continue to primarily report through AGSOC to AGMIN.
<u>Recommendation 19</u>	The NBC should include the CEO of the Australian Local Government Association, and the New Zealand Government be invited to include a representative.	<p>NTG agrees that the CEO of the Australian Local Government Association should be invited to include a representative at NBC.</p> <p>NTG suggests the New Zealand Government be invited to participate as an observer rather than a full member.</p> <p>NTG notes that AHC no longer have NZ as a member of the sectoral committee.</p> <p>NTG notes that international representatives on these committees can create issues when there is discussion around trade and market sensitivities.</p>
<u>Feedback request 4</u>	The Review Panel seeks feedback on the proposed Terms of Reference for the NBC.	<p>NTG agree the TOR are a reasonable preliminary draft for further discussion.</p> <p>NTG suggests that it should explicitly state that the two members are to represent different sectors of each jurisdiction, for example environmental representative and agricultural representative.</p>

<p><u>Recommendation 20</u></p>	<p>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.</p>	<p>NTG does not agree and have concerns that this may not improve Environmental biosecurity and be detrimental to the biosecurity policy arrangements of both MPC and IPAC, both of which add considerable rigor to the national biosecurity framework.</p> <p>NTG notes that biodiversity and agricultural impacts of established pests and diseases (including weeds and freshwater pests) are handled by the IPAC and the MPC deals with non-production risks and incursions of marine environmental pests.</p> <p>Both AHC and PHC deal with diseases impacting native wildlife and aquatic animals and tramp ants respectively. NTG believe to have appropriately skilled technical experts on a committee to deal with all of these issues is not possible and therefore suggest a EBC with subcommittees that focus on marines, invasive and diversity respectively The EBC would need to feed into other biosecurity committees particularly with respect to Market Access. Environmental pests themselves may not be viewed as trade restrictive but the impacts of them can be in light of the treatments required to control or eradicate the pest and then causing issues with registration of chemicals, residues and withholding periods for agricultural products.</p>
<p><u>Recommendation 21</u></p>	<p>The NBC should take steps to increase its public profile and openness, including establishing a stand-alone website. The website could be maintained by the Australian Government Department of Agriculture and Water Resources. Key policy frameworks, agreements and reports of the NBC should be made publicly available on the site.</p>	<p>NTG agree that biosecurity needs an enhanced profile and level of transparency</p> <p>Establishing and maintaining a standalone website will require ongoing funding and dedicated staffing.</p>
<p><u>Recommendation 22</u></p>	<p>AGSOC should establish and provide oversight to an independent IGAB Evaluation Program to assess and report on implementation of each jurisdiction’s commitments under the IGAB. The evaluations, or a summary of them, should be made publicly available following ministerial consideration.</p>	<p>NTG note that the success of the national biosecurity system depends on all jurisdictions and Commonwealth meeting their ‘core’ or ‘baseline’ commitments under the IGAB and the various emergency response deeds. The NTG however is concerned about the level of resources available to achieve the desired outcomes and highlight that smaller jurisdiction are at considerable disadvantage to resource the key foundation elements of the IGAB including information systems, databases, emergency response capacity and legislative and policy reform that have equivalent obligations and resource investment regardless of the size of the jurisdiction.</p> <p>NTG does not agree that establishing an independent IGAB Evaluation Program to provide the Australian community a structured assessment of the performance of each jurisdiction, for ongoing accountability among jurisdictions will in itself provide more resources to enable small jurisdictions to meet their commitments.</p> <p>NTG notes that the ACT is recognised as being supported by NSW government and recommends that the Australian Government through a formal MOU between Northern Australian Quarantine Strategy and NTG supports the NT meet it biosecurity obligations.</p>

<u>Recommendation 23</u>	The NBC should clarify core commitments of jurisdictions for use in the independent IGAB Evaluation Program to be documented in a future IGAB.	NTG notes performance standards have not been successfully implemented in the past. NTG notes this area needs further development.
<u>Recommendation 24</u>	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.	NTG notes this currently occurs and agrees.
<u>Recommendation 25</u>	AGSOC should establish, as a priority, an Industry and Community Advisory Committee to provide advice to the NBC on key policies and reforms.	NTG suggest this should be an NBC subcommittee rather than AGSOC. NTG agree an Industry and Community Advisory Committee is required noting that clarity of role will be critical to manage outcomes successfully.
<u>Recommendation 26</u>	The NBC should convene a dedicated annual national Biosecurity Roundtable for AHA and PHA members to provide direct input to the NBC.	NTG believes the Industry and Community Advisory Committee (Recommendation 25) will be able to undertake this role.  NTG suggests the roundtable is largely a promotional and communication activity of wider stakeholders and NBC and ICAC should have input on the key focus of this annual event. NTG note that PHA and AHA currently maintain a vibrant relationship with their industry embers and meet regularly at industry meetings to discuss a range of biosecurity issues.
<b>Funding our national system</b>		
<u>Recommendation 27</u>	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.	NTG notes the success of the national biosecurity system is reliant on sustained levels of well-targeted investment, underpinned by strong funding principles and good consultation. NTG acknowledges there are funding pressures across the national system. NTG does not agree that NBC or the ICAC can direct the funding principles a state or territory will apply in their jurisdiction. The NTG notes that while the current IGAB investment principles are sound and there is wide support for maintaining them in a future IGAB, that a jurisdiction will determine the funding appropriate in that jurisdiction as part of the budget process and priorities of the jurisdiction NTG notes that there is limited evidence of practical implementation of the IGAB principles by jurisdictions and that this reflects individual priorities of jurisdictions.
<u>Recommendation 28</u>	The NBC, with key industry and non-government partners, should agree uniform and fully inclusive categories of funding activity for the national biosecurity system.	NTG does not agree there is significant benefit to be gained by categorising investment across the entire biosecurity system. NTG believe this would be a non-productive use of resources with significant variance in recording of data to such an extent the results would be meaningless.

		<p>Therefore NTG does not agree it is useful to resource the assessment of the full suite of activities for all system participants with a view to analyse the data.</p> <p>NTG notes there is currently limited ability for system participants beyond jurisdictions to categorise their contributions however believe the reporting would be so inconsistent to make the data meaningless.</p>
<u>Recommendation 29</u>	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.	<p>NTG does not agree with public reporting of the stocktake. NTG agree in principle with the collation of the stocktake data, however note that it is a relatively rough analysis and there has been significant differences in reporting of funding within categories within the stocktake.</p> <p>NTG highlight the collection of the stocktake of investment across categories was intended to inform trends of investment and was never intended as a public reporting activity. NTG note the level of rigor and audit would need to significantly change if the stocktake was to be publicly reported and the stocktake used for a different purpose to the guidance on investment activity it was intended for.</p>
<u>Recommendation 30</u>	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.	<p>NTG suggest this recommendation needs to be reworded given the panel has implied it is in relation to new and emerging pest priorities and not endemic pests. Return on investment is different to highest yield and consequently this appears to be directed at endemic pests.</p>
<u>Recommendation 31</u>	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.	<p>NTG note the Australian Government’s RRRR model can be used to inform advice on the return (in terms of reduced risk) for investments to manage biosecurity risk and improve confidence that resources are allocated to areas of greatest risk reduction.</p> <p>NTG note the Risk Return Resource Allocation model and agree in principle noting that NTG will determine jurisdictional priorities and allocate biosecurity investment within the Territory based on their priorities.</p>
<u>Recommendation 32</u>	AHA and PHA should coordinate an industry stocktake of national biosecurity system investments, making the results publicly available.	<p>NTG does not agree there is significant benefit to be gained by categorising investment across the entire biosecurity system.</p> <p>NTG believe this would be a non-productive use of resources with significant variance in recording of data to such an extent the results would be meaningless.</p>

<u>Feedback request 5</u>	<p>The Review Panel seeks feedback on the following options to ensure a more rapid-response to an exotic pest or disease incursion:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul>	<p>NTG notes there are provisions in place for managing an emergency response to an incursion, but have experience of significant delays while the technical feasibility of eradication and the collation of adequate data to inform this decision are collected. This leaves jurisdictions bearing significant costs and legal risk until the outcome is determined. The impact on the relationship between government and industry in these circumstances is significant</p> <p>NTG agree an alternative arrangement is desirable however note the arrangements under the deeds are by necessity rigorous to ensure appropriate use of resources and repeatability of decision making.</p> <p>NTG notes that AHC have raised this issue within the EADRA for the cost sharing of a national livestock stand still for a rapidly spreading livestock disease. The success of such a measure requires immediate action and the delays to disease confirmation and EADRP development and agreement can mean significant costs to the jurisdiction.</p>
<u>Recommendation 33</u>	The emergency response deeds for aquatic animals and exotic production weeds should be finalised within 12 months.	NTG agrees.
<u>Recommendation 34</u>	State and territory governments should review their biosecurity cost-recovery arrangements to ensure they are consistent, appropriate and transparent.	NTG agrees.
<u>Recommendation 35</u>	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.	NTG agree, however do not believe that all sectors of the biosecurity system have greater capacity to pay.
<b>Measuring system performance</b>		
<u>Recommendation 36</u>	The NBC should establish a time-limited task group to progress development of a performance framework and performance measures for the national biosecurity system.	<p>NTG notes that there are many areas where the effectiveness of the national biosecurity system can and should be improved. Agreed.</p> <p>NTG agrees that the Australia’s biosecurity system continues to protect the nation from many exotic pests and diseases. Importantly this underpins a profitable agricultural industry though improving and maintaining market access and supporting a healthy and biodiverse environment underlying much of Australia’s tourism.</p> <p>NTG notes that performance data can support and better direct investment decisions, identify key risk areas within the national system, and improve the management and effectiveness of existing and operations.</p>

		<p>NTG agrees any evaluation of performance needs to be a cost-effective activity.</p> <p>NTG agree that NBC establish a time-limited task group to advance development of a performance framework for the national system.</p>
<u>Recommendation 37</u>	<p>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.</p>	<p>NTG agree that the Australian Government need to take leadership in this area.</p> <p>AHC is moving towards this sharing and access of biosecurity data and information under the NAHS&amp;D business plan but historically this has proven difficult and of little net benefit over existing arrangements. The adoption of a common IT platform (YES MAX) will facilitate this objective.</p> <p>The National biosecurity Information Governance working group is striving to achieve this objective.</p>
<u>Recommendation 38</u>	<p>Data and knowledge sharing should be a core commitment of jurisdictions under the IGAB. Minimum standards and specifications should be agreed for data sets.</p>	<p>NTG agree highlighting that multiple databases is not efficient or effective.</p>
<u>Recommendation 39</u>	<p>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.</p>	<p>NTG agree.</p>
<b>A future system, a future IGAB</b>		
<u>Recommendation 40</u>	<p>Jurisdictions should adopt the proposed new priority reform areas and associated work program for IGAB2, and amend the IGAB in line with proposed revisions.</p>	<p>NTG have not agreed to all the priority reform areas and suggest that comments should be taken into consideration and a second draft circulated before amending the IGAB.</p>