



Intergovernmental Agreement on Biosecurity
Review Draft Report:
Submission from the South Australian Government
March 2017

Executive Summary

The South Australian Government welcomes the opportunity to comment on the *Intergovernmental Agreement on Biosecurity Review Draft Report*, following our previous submission to the review's discussion paper. Biosecurity is primarily managed across three government agencies in South Australia: Primary Industries and Regions South Australia (PIRSA); the Department of Environment, Water and Natural Resources (DEWNR); and SA Health.

The Intergovernmental Agreement on Biosecurity (IGAB) is acknowledged as an important national initiative and its continuation is vital for ongoing improvements in national biosecurity effectiveness, capacity and integration. It is appropriate that it stays at the First Ministers level for signing, which recognises it as a key function of governments.

The South Australian Government is pleased that key issues of concern raised in our first submission to the IGAB review have been acknowledged in the draft report as areas in need of improvement.

Overall, the majority of the 40 recommendations are supported and some commentary and comments have been provided to assist with preparation of a final report. Recommendations that are not fully supported are 11, 12, 17, 19 and 20. Reasons have been provided in relation to our concerns to further assist with finalizing the report.

Glossary

AGMIN	Agriculture Ministers' Forum
AGSOC	Agriculture Senior Officials Committee
AHA	Animal Health Australia
AHC	Animal Health Committee
AIIMS	Australasian Inter-Service Incident Management System
CEBRA	Centre of Excellence for Biosecurity Risk Analysis
CISS	Centre for Invasive Species Solutions
COAG	Council of Australian Governments
CRC	Cooperative Research Centre
IGAB	Intergovernmental Agreement on Biosecurity
IPAC	Invasive Plants and Animals Committee
MPSC	Marine Pests Sectoral Committee
NBC	National Biosecurity Committee
NEBRA	National Environmental Biosecurity Response Agreement
NRM	Natural Resources Management
PFA	Pest Free Area
PHA	Plant Health Australia
PHC	Plant Health Committee
R&I	Research and Innovation
RD&E	Research, Development and Extension
RDC	Research and Development Corporation
RIRDC	Rural Industries Research and Development Corporation

Introduction

The South Australian Government, welcomes the opportunity to comment on the *Intergovernmental Agreement on Biosecurity Review Draft Report*. Preventing the introduction, establishment and spread of high impact pest and diseases is important in maintaining our state's premium food and wine industries and clean environment, to maintain productivity, market access and tourism, and to protect the intrinsic values of South Australia's natural and cultural landscapes.

Biosecurity is a cross-cutting issue in government and various aspects are managed across three government agencies in South Australia. Primary Industries and Regions South Australia (PIRSA), predominantly through the Biosecurity SA division, integrates state-level leadership on livestock and plant industries' health, aquatic pests (freshwater and marine), weeds and pest animals. PIRSA takes a partnership approach with the Department of Environment, Water and Natural Resources (DEWNR), which has the operational lead for weed and pest animal management (on behalf of the eight regional Natural Resources Management boards). DEWNR also has a state-level focus on wildlife health and biosecurity risks to native plants. SA Health leads on zoonotic diseases, such as mosquito-borne viruses and on food safety (in collaboration with inspections undertaken by Biosecurity SA and local governments). As owners and managers of land parcels, various state government agencies (including DEWNR, SA Water and the Department for Planning, Transport and Infrastructure) and local governments undertake pest control activities for biosecurity, public safety, amenity and/or biodiversity protection purposes.

The South Australian Government collaborates on biosecurity matters with other state/territory governments and the Australian Government, at both the strategic and operational level. South Australia is an active member of the intergovernmental biosecurity policy forum, the National Biosecurity Committee (NBC), which is charged with implementation of the IGAB. Similarly, South Australia is active on NBC's four specialist sectoral committees that deal with all types of (non-human) diseases, pests and weeds that have economic, environmental and/or social impacts: Animal Health Committee (AHC); Plant Health Committee (PHC); Invasive Plants and Animals Committee (IPAC); and Marine Pest Sectoral Committee (MPSC). Intergovernmental (and industry) collaboration also occurs through research partnerships, national surveillance programs and incursion emergency responses (e.g. working closely with the Department of Agriculture and Water Resources on the recent Khapra beetle interception). As a smaller jurisdiction, but facing the same future risks and pathways as the rest of the country, it is fundamental for South Australia to be part of a national biosecurity system.

In our state's previous submission on the IGAB Review's Discussion Paper, the following key improvements were raised:

- A national Statement of Intent for biosecurity outlining roles of government, industry and community is needed to better engage those outside government.

- There is a need for nationally consistent methods to assess risks, impacts and benefit:cost of pests and diseases at the post-border level to better target and coordinate resources.
- National surveillance plans need to be enacted for priority pests and diseases.
- The Commonwealth should have a proactive role in resolving significant post-border quarantine issues between states and territories, including domestic trade disputes.
- The Commonwealth should have greater leadership in several areas to reduce duplication of effort and ensure consistency:
 - Data collection and sharing, including development of surveillance applications
 - National plan for diagnostic capability
 - National research and extension priorities
 - Nationally consistent emergency response training.
- National priorities and an implementation plan are needed for environmental biosecurity.
- National cost recovery principles should be considered along with exploring national funding models to implement the IGAB.

We are pleased that these improvements have largely been considered in the draft report.

The Intergovernmental Agreement on Biosecurity (IGAB) is acknowledged as an important national initiative and its continuation is vital for ongoing improvements in national biosecurity effectiveness, capacity and integration. This submission provides commentary on the South Australian Government's position in relation to the national biosecurity system areas identified for future reform through a revised IGAB. Commentary is given on all draft recommendations made by the Review Panel.

Shared responsibility (Chapter 2)

- The review report's emphasis on greater involvement of industry and community participants in biosecurity decision-making, investment and ongoing actions is welcomed. The complexity of participants was outlined in the Australian Government's submission to the IGAB review discussion paper:
 - Beyond agriculture, the Australian Government submission (p. 12) highlighted implementation of the shared responsibility principle would need to take account of sectors other than agriculture that could be 'beneficiaries or risk creators' (system participants), including mining; tourism; infrastructure, building and construction; transport (shipping, ports, road and rail); environment (exotic plant or animal collectors, national parks, zoos and aquaria); and defence (movement of personnel and equipment in and out of Australia).
 - The cross-cutting nature of biosecurity needs to be a central principle in the shared responsibility implementation of the review's recommendations. Whilst collaboration with agricultural industries should and can be significantly improved, other sectors should also be concurrently engaged.

- South Australia agrees that there is inconsistent understanding on the concept of shared responsibility in biosecurity between governments, industries and the wider community. A National Statement of Intent (separate to a revised IGAB), and formalised mechanisms for ongoing engagement with and leadership by industry and community stakeholders in biosecurity issues, should help shift Australia from the aspirational to the operational in achieving shared responsibility.
- The defining and articulation of roles and responsibilities is an important first step for all national biosecurity system participants to clearly understand, accept and collaboratively implement them. In general, the roles and responsibilities presented in Table 1 are appropriate (but see comments below). However, given the diversity in machinery of government, industries and socio-economic and cultural capacity to engage in biosecurity across Australia, the focus should initially be on core roles and responsibilities, rather than be all encompassing. There is considerable repetition in Table 1 that could be avoided with an alternative presentation that lists the roles in the first column and then has participant columns that signify lead/co-lead/support responsibilities.
- The revised IGAB needs to clarify the individual and collaborative roles and responsibilities of the Australian and State/Territory governments (i.e. columns 1 and 2 of Table 1 in the draft review report).
 - To reduce ambiguity, delineation is needed between what are roles (activities) and what are responsibilities (leadership taken). There are also some roles/responsibilities that belong to individual governments (e.g. border quarantine for Australian Government, enforcement of control of declared pests for State/Territory governments) and some which must be done jointly at the national level to be effective and avoid duplicated effort (e.g. surveillance programs for priority exotic pests, resolving domestic trade disputes).
 - Uncertainty over the Australian Government’s responsibilities post-border needs to be addressed (e.g. eradication responses to interceptions amongst imported goods beyond international transport hubs, ballast water and biofouling management of international vessels undertaking domestic voyages).
 - The Australian Government has a national leadership role, not only in negotiating and facilitating international trade and market access, but also in driving consistency in such trade and access for goods with managed biosecurity risks within Australia.
- The current roles and responsibilities of local government in biosecurity vary across jurisdictions with different legislation and machinery of government. Many of the dot points in Table 1 for Local government are actually the statutory responsibility of regional Natural Resources Management (NRM) Boards in South Australia.
 - This is not to say that local government is not an important stakeholder, particularly in relation to providing vital functional support in biosecurity emergencies. For example, several individual councils have provided valuable assistance to PIRSA to combat pest and disease outbreaks and aid recovery.

- Local government is also important in the early detection of new pests and diseases, including those which may pose risks to amenity, public safety, forestry and the natural environment. This is particularly pertinent for urban areas where exotic organisms are likely to be first introduced from overseas or interstate movements.
- NRM Boards play an important leadership and facilitation role in invasive species management in South Australia, across the biosecurity management continuum. Table 1 should have a column that recognises the statutory and/or enabling roles that regional NRM organisations play in agricultural, environmental and community biosecurity across Australia.
- *Draft recommendation 1:* Development of a draft National Statement of Intent with government, industry and community stakeholder co-development is supported. The National Statement of Intent should be a separate to the IGAB, the latter being a formal government document only.

Market access (Chapter 3)

- South Australia has a trusted international reputation for premium food and wine produced in our clean environment and exported to the world. Every year the South Australian Government spends about \$5 million keeping fruit fly and other plant pests out of the State, through a range of prevention, surveillance and eradication measures. As the only Australian mainland state that is fruit fly free, this has ensured the protection of the state's commercial production of fruit and vegetables from the world's most economically significant pest (in 2015-16, the estimated farm-gate value of the state's horticultural produce vulnerable to fruit fly infestation, including wine grapes and almonds, was \$1.15 billion). It has also secured horticultural producers' access to lucrative export markets without expensive and unnecessary post-harvest treatments (e.g. citrus and almond export markets in the United States, New Zealand and Japan worth about \$120 million a year).
- *Draft recommendation 2:* In determining priorities for negotiating international market access, a fair balance is needed between a national single industry approach versus a regional multi-stakeholders approach. Pest Free Areas (PFAs) for fruit fly are important to South Australian regional economies and have enabled access to overseas markets that Australia could otherwise not readily access without costly treatments in place (e.g. citrus to the USA and Japan; nectarines to China). International market access also needs a clear process around transparency and communication, to establish and maintain trading partners' trust.
- *Draft recommendation 3:* It is agreed that technical market access is an important issue to continue to be considered by NBC.
- *Draft recommendation 4:* The Plant Health Committee approved a list of 40 national priority exotic plant pests and diseases (which actually equates to 141 different taxa) in 2016. Many of these would pose a threat to export market access and jurisdictions should be cooperating on improving surveillance and diagnostic systems.

- *Draft recommendation 5:* The South Australian Government agrees that the interstate trade dispute resolution process as agreed by Ministers in 2010 should be strengthened and more readily utilised in cases where the scientific basis of biosecurity interstate trade restrictions is questionable. We also agree that this should be formalised in the revised IGAB. The issue of the Commonwealth not having current legal basis for intervention in interstate disputes is recognised (except where possible under S.92 of the Australian Constitution). However, there are benefits of Australian Government involvement in dispute resolution, given the reported increasing scrutiny of export markets of domestic trade restrictions.
- *Draft recommendation 6:* This is supported and links to the previous recommendation. The Australian Government needs to lead on proof of area freedom zones and set the national rules to allow all states and territories to follow. Plant Health Committee agreed in June 2014 to frameworks and processes to support integration and optimisation of trade and certifying pest area freedom presented by the Australian Government. However, there is little incentive for industry or jurisdictions to undertake costly surveillance to demonstrate pest area freedom, unless there is a clear market access imperative. The Australian Government can play a role in ensuring that area freedom claims are underpinned by sound science (i.e. they could refuse to endorse area freedom claims without good evidence and endorse area freedom where national protocols and acceptable levels of protection are in place).

Environmental biosecurity (encompassing biodiversity, ecosystems and social amenity) (Chapter 4)

- The review has correctly identified environmental biosecurity as an important area in need of national improvement, but with challenging management issues including heavy reliance on ongoing government funding, feasibility of early detection and eradication of incursions, multi-species invasions, and sheer magnitude and diversity in terms of geographic scale, ecosystems/species at risk and types of pests and diseases. The scope of environmental biosecurity is very broad in terms of organisational collaboration and expertise required for effective interventions. A good indication of this scope is given in Table 3 of the National Environment and Community Biosecurity RD&E Strategy.
- The review underplays the substantial efforts that currently go to managing established priority pests and diseases in natural ecosystems, such as volunteer, contractor, government, NRM organisation and private weed and pest animal control programs. These are largely focused on asset-protection, as part of broader environmental management, but require ongoing effort and need to be large and multi-land holder in focus to have sustained, landscape-level benefits. An alternative, albeit single pest-species approach is investing in biological control, which is known to be highly cost-effective in reducing, though not eliminating, on-going pest impacts.
 - Twelve National Threat Abatement Plans (under the Environment Protection and Biodiversity Conservation Act 1999) and most of the Weeds of National Significance

National Strategic Plans have recommended actions for the prevention, containment and/or management of environmental impacts of a range of priority established pests and diseases. However, effectively resourcing their implementation has been challenging.

- The review frequently refers to animal and plant biosecurity streams and introduces the need for environmental biosecurity. This appears to neglect IPAC and MPSC and jurisdictional governance relating to invasive species (weeds, pest animals, freshwater/marine aquatic pests), which focus on management of the economic, environmental and social impacts of these types of pests.
- There are errors/omissions in the attribution of environmental biosecurity risks to the various sectoral committees in section 4.2.2. However, it is noted that these risks often do not get an equivalent amount of attention as production biosecurity risks in the committees.
 - AHC’s brief includes wildlife disease.
 - PHC’s brief includes exotic terrestrial invertebrates impacting on native plants or the environment (e.g. tramp ants), and exotic diseases of native plants.
 - IPAC’s brief includes vertebrate pests (excluding marine fish), weeds and freshwater pests (including invertebrates and algae). It does not include disease.
 - MPSC’s brief is marine fish, invertebrates and algae.
- *Draft recommendation 7:* The National Environmental Biosecurity Response Agreement (NEBRA), whilst currently under a five-year review, has a clear process that already addresses the concerns raised in this recommendation. The area for improvement would be for governments to better communicate the incursion responses being addressed and decision-making processes which consider cost:benefit and feasibility of eradication.
- *Draft recommendation 8:* As stated in the draft review report, South Australia already has a MoU between the primary industries and environment departments on biosecurity and emergency response. This has been important for clarity in roles and responsibilities and will be reviewed in early 2017.
- *Draft recommendation 9:* More definitive commitment to environmental biosecurity in the revised IGAB is supported. However, specific types of diseases need not be singled out for mention. Evaluation and reporting of the effectiveness of environmental biosecurity activities and arrangements should be specified.
- *Draft recommendations 10 and 11:* Further consideration is required on the function of a proposed Chief Environmental Biosecurity Officer and a proposed Environmental Biosecurity Committee. If the Panel is seeking three parallel structures focused on protecting animal industries, plant industries and the environment (including public amenity) then there will be a risks of forming “silos”, plus overlapping technical expertise requirements for those types of pests and diseases that impact across these three (e.g. weeds).

- The previous incarnation of the Environmental Biosecurity Committee developed a list of national priority pests and diseases. However, the committee was discontinued as it was found to largely overlap with the role of the four other biosecurity sectoral committees. In addition, it became apparent that pests which uniquely impact on the environment are rare in practice and a cross-sectoral approach was often needed.
- The current four biosecurity sectoral committees are based around technical and policy expertise, and reflects jurisdictional legislation and corresponding machinery of government. Each committee has representation from the Australian Government Department of the Environment and Energy.
- As per recommendation 8, South Australia has effective cross-government arrangements in addressing invasive species issues. In particular, PIRSA (through Biosecurity SA) and DEWNR (which hosts NRM board activities through a service level agreement) collaborate closely in such areas as emergency management, surveillance, policy development and technical advice.
- A re-established Environmental Biosecurity Committee (recommendation 11) is **not supported**. Instead the reviewed IGAB and terms of reference of NBC (and its sectoral committees) should ensure a balanced focus and membership that manages risks to industries, the environment and public amenity. The separation of IPAC and MPSC should continue due to their vast differences in issues and stakeholders.
- The key national driver in environmental biosecurity is governments' budget allocations to preparedness, response and management of environmental pests and diseases.
- The Panel should consider the merits of a Chief Invasive Species Officer as an alternative to the proposed Chief Environmental Biosecurity Officer. The former would still include environmental risks in their role, but work more across government and with external stakeholders in also addressing the economic and social risks that invasive species pose. This reflects invasive species control programs usually occurring across multiple land uses with many stakeholders.
- *Draft recommendation 12:* Animal Health Australia and Plant Health Australia are primarily industry-driven organisations and accordingly do not have an environmental focus or associated expertise. The review report has not made a case for why these organisations should expand their roles into environmental biosecurity, as opposed to other existing organisations within or outside of government. Any such expansion should be policy-driven in terms of specific environmental biosecurity tasks required by NBC. Accordingly this recommendation is **not supported**.

National pest prioritisation (Chapter 5)

- *Draft recommendations 13 and 14:* As noted in the report, NBC's sectoral committees have advanced significantly in recent years on identifying national priorities, for both established pests and diseases (e.g. Weeds of National Significance) and exotics that are a future incursion risk (e.g. Plant Health Committee 'top 40'). The South Australian Government agrees with the need for all biosecurity sectors to determine national priorities for future incursion risks, as a basis for awareness, pathway risk management, surveillance and incursion response preparedness.
 - Whilst a focus on particular pests/diseases has merit for galvanizing community and industry activity, a focus on priority pathways is likely to have more benefit in the longer term. The latter would cover more pests/diseases and foster technical, behavioural and institutional change to improve pathway hygiene practices. This philosophy is driving South Australia's development of the One Biosecurity program for the future holistic management of livestock diseases.
 - Similar risk assessment methods are desirable, but past attempts at a "one size fits all" prioritisation approach across all pests and diseases have not worked. The risk management context varies with factors such as geographic scale, industry or ecosystem, stakeholders and possible control technologies along the invasion continuum. For invasive species there can also be high levels of uncertainty in predicting and quantifying potential distribution and impacts at a national level.
 - Prioritising pest and disease risks across sectors is even more challenging. The relative value of different industries or environments becomes the main determinant of priority-setting, rather than the potential biosecurity impacts themselves. This then becomes complicated with how to take account of environmental and social values which cannot be readily quantified in monetary terms.
 - A single pest/disease prioritisation system should not be mandated. Rather, a national risk assessment framework should be developed through NBC, informed by international best practice (e.g. AS/NZS ISO 31000:2009, Risk management - Principles and guidelines). Significant recent research efforts to develop biosecurity risk assessment methodology (e.g. Plant Biosecurity CRC, Centre of Excellence for Biosecurity Risk Analysis [CEBRA]), should be utilised.
 - Whilst it is good to have a small set of national priorities to focus activities, priority setting also happens at state/territory, regional and local scales. For example, many of the "top 40" plant pests/diseases are not directly relevant to South Australia (e.g. those which impact on tropical crops). Jurisdictions will have an ongoing need to determine local priorities for such purposes as interstate trade regulation and surveillance for pest/disease incursions from other jurisdictions.
 - Prioritisation should not be at the expense of detecting, reporting and assessing any new exotic species to Australia of pest or disease potential. This is already a requirement of

the NEBRA and the animal health and plant health deeds, such that a national decision is made on whether an incursion response is warranted.

- Most of the new weeds of the future will likely arise from naturalisation of existing garden plants in Australia. Similarly, new pest animals (including fish) will mostly be sourced from escape/release from legal/illegal keeping. This is an important consideration in prioritising potential threats (i.e. not all risks are off-shore).

Research and innovation (Chapter 6)

- The South Australian Government agrees with the need to enhance cross-sectoral biosecurity research and innovation (R&I), provided this is conducted in close cooperation with end-users to ensure the practical adoption of project findings. There is often a creative tension between conducting new science and its ready applicability for use by government and industry. This needs to be carefully managed to maximise returns on investment.
- *Draft recommendation 15:* Whilst it is desirable to work towards an agreed, holistic new set of National Biosecurity R&I priorities, the immediate issue to address is the coordinated, funded implementation of the three existing national R&I strategies for animal industries, plant industries and environment/community. Each of these strategies had considerable stakeholder engagement in their development.
 - There is a high degree of similarity in priorities amongst the three strategies. NBC could improve coordination of R&I by establishing a high-level, cross-sectoral committee of government, Research & Development Corporation (RDC) and research providers to provide joint governance of the implementation of these strategies.
 - Whilst cross-sectoral research is important, there will still be an ongoing industry need to invest in techniques for improved management of specific, priority pests and diseases.
- The National Environmental Science Programme of the Department of the Environment and Energy is a potential significant source of funding for environmental biosecurity R&I.
- With regards to the suggestion of establishing a new entity for cross-sectoral biosecurity R&I:
 - A new, stand-alone entity (Option 1) may have substantial start-up costs, but ownership/membership could be framed around end-users to foster a pathway to implementation of new technologies (e.g. surveillance technologies, diagnostics, risk models) by government and industry. In this regard it could link well to PHA and AHA.
 - Addressing cross-sectoral biosecurity R&I within an existing RDC (Option 2) has efficiencies in terms of existing organisational infrastructure and project governance systems. Rural Industries Research and Development Corporation (RIRDC) is suggested by the Review Panel. Whilst cross-sectoral, RIRDC is a small RDC and would need to

rapidly build high level expertise in understanding the complexities of biosecurity R&I needs and methodologies.

- The review should include commentary on learnings from the Australian Government’s investment into CEBRA as a possible mechanism to build cross-sectoral biosecurity R&I. The National SITplus consortium (sterile insect technology for Queensland fruit fly) is also a good model of how various government, industry and university funding sources can be pooled to achieve a nationally significant advance in Australia’s biosecurity system.
- The Review Panel suggestion of a new biosecurity levy to fund R&I may be slow to implement and it would be more straightforward to redirect a portion of existing RDC funds to the R&I entity. However, this would need to be done in a way which engages the current RDCs, who best understand the biosecurity requirements on their sectors.
- A consideration for implementation of either option is having competitive funding calls from a wide range of research providers, which would foster innovation, cross-discipline and cross-organisation partnerships, and build capacity in biosecurity science in a range of organisations across Australia. It has been the South Australian Government experience that recruiting personnel with high level scientific skills in biosecurity delivers benefits in terms of more robust operational programs and strategic policy.

Strengthening governance (Chapter 7)

- *Draft recommendation 16:* A future IGAB should continue to be an agreement between First Ministers. This reflects the impact of biosecurity risks on all aspects of society, business and the environment. It also recognises that biosecurity is a cross-cutting issue across government agencies.
- *Draft recommendation 17:* Inclusion of specific ministers and agencies with the revised IGAB document would likely rapidly date the document as changes occur over time. South Australia already has effective working relationships between ministers and between agencies on biosecurity matters. This recommendation is **not supported**.
- *Draft recommendation 18:* The review’s aim to empower the NBC to achieve greater reform and collaboration is welcomed. First Ministers establishing the NBC would potentially require a change to current COAG arrangements, which do not include AGMIN (to/through which NBC would report, via Agriculture Senior Officials Committee).
 - A key constraint at both the NBC and sub-committee levels, which the review has identified, is a large reliance on in-kind goodwill and informal collaboration to progress policy reforms. Formal cost-sharing arrangements are lacking, which hinders the capacity to secure dedicated personnel for conducting specific reform projects within timeframes that non-government biosecurity participants would expect.

- *Draft recommendation 19:* South Australia has noted the recommendation that NBC membership is expanded to include the CEO of the Australian Local Government Association. However, it is not clear what actions would follow for local government arising out of NBC, given differences in their statutory roles across the country and their high degree of independence. However, liaison with local government is important at the state scale, particularly in relation to biosecurity emergency preparedness.
 - Representation of the regional natural resources management sector could be considered as this is more pertinent to regional pest management than local government (at least in a South Australian context). In this regard the chair of the National Landcare Advisory Committee is suggested. This committee works across the agriculture, NRM, landcare and environment sectors.
 - A New Zealand Government representative may offer valuable insight into resolving biosecurity management issues, but potential conflicts of interest over market access discussions would need to be managed.
- The roles of NBC in its proposed new Terms of Reference are appropriate, but the increased requirements for formalised national collaborations and biosecurity system governance would require additional investment into high level policy support for the committee.
- The cost-sharing issue raised under recommendation 18 above is pertinent to the NBC Terms of Reference dot point “jointly investing in annual program of work to strengthen national arrangements”.
- *Draft recommendation 20:* The South Australian Government **disagrees** with the proposed changes to the NBC sub-committee structure.
 - Refer to dot points made above under Environmental Biosecurity regarding points against re-establishing an Environmental Biosecurity Committee, combining IPAC and MPSC, and likely overlaps in policy and technical expertise required.
 - Within the NBC and the four existing sectoral committees there is adequate clarity about who is responsible for what types of pests and diseases (again see Environmental Biosecurity section above).
 - IPAC’s brief covers the impacts of weeds, vertebrate pests and aquatic pests on industries, the environment, public amenity and public safety (i.e. it is not solely environmental). National systems to manage pathways of introduction, detect incursions (including illegal keeping and naturalisations), undertake risk assessments and eradications of invasive species are much less developed than those for plant health and animal health. It is incorrect to say that IPAC is at a mature stage.
 - The four sectoral committees primarily perform government policy functions that often relate back to jurisdictional legislation and ministerial approval. An example is the complex policy and legal considerations that IPAC is responsible for leading in relation to the

proposed release of the carp herpesvirus. Organisations such as the Centre for Invasive Species Solutions, PHA and AHA can undertake projects to support policy development and implementation, but they are not decision-making machinery of elected governments.

- *Draft recommendation 21:* The South Australian Government agrees that NBC's profile could be improved through wider, more timely and more detailed communication of its outputs and achievements.
- *Draft recommendations 22-24:* Independent evaluation of the implementation of each jurisdictions' commitments under the IGAB risk, and the subsequent reporting on this, needs to be done in a manner which avoids politicisation of biosecurity. It is important to seek continual improvement and to minimise "weak links" in the national biosecurity system, but larger jurisdictions with greater government revenues will likely be assessed as being better performers.
- *Draft recommendation 25:* The establishment of an Industry and Community Advisory Committee to provide advice to NBC on key policies and reforms is supported. It would be important that members have a good understanding of how biosecurity works so they can provide informed comment on potential improvements.
- *Draft recommendation 26:* In the report's spirit of fostering cross-sectoral collaborations, the proposed annual national Biosecurity Roundtable should not just be restricted to AHA and PHA members. Other stakeholders should be invited representing environmental management, shipping, transport and tourism.

Funding the national system (Chapter 8)

- Specialist additional expertise in bio-economic policy analysis will be required to effectively act on the review report's funding recommendations for greater transparency on returns on different types of biosecurity investment.
- *Draft recommendations 27-29 and 32:* The South Australian Government agrees that there should be closer collaboration with industry and community on revising the *National Framework for Cost Sharing Biosecurity Activities* to enable its practical application. This includes agreement on categories of funding activity and the public reporting of investment by governments and industry.
- *Draft recommendations 30 and 31:* There should be a nationally-coordinated approach to governments reviewing their own current biosecurity expenditures, in line with a national biosecurity system approach. This could be achieved through the recommendation that the Australian Government provides assistance to jurisdictions for their adoption of the Risk Return Resource Allocation model.

- South Australia applies a semi-quantitative pest risk management model for weeds and pest animals, to inform policy and operational management actions for particular species. It enables more informed decision-making than the broad principle of the “invasion curve”.
- Governments’ intention to collectively shift their balance in biosecurity investment from established pests and diseases towards prevention and early intervention is outlined in the National Policy Framework for the Management of Established Pests and Diseases of National Significance.
- Uncertainty over eventual national cost-share funding for biosecurity emergency responses can cause hesitation in committing resources to investigate new pest and disease detections. For invasive species this is a particular challenge, as the extent of infestation can be difficult to delimit where pests are cryptic (e.g. dormant seedbank) and/or highly mobile (e.g. flight dispersal). Cost-sharing arrangements should allow for a period of problem definition and assessment, but the length of this cost-shared investigative period and the level of resourcing required would need to be considered on a deed by deed basis to take account of different types of pests and diseases.
- *Draft recommendation 33:* A work plan for the finalisation of the emergency response deeds for aquatic animal health and exotic production weeds should be set by NBC in consultation with affected industries. However, this is most unlikely to be achieved within twelve months. Each deed needs a dedicated, high-level resource to facilitate the complex negotiations required between potential industry and government signatories.
- *Draft recommendation 34:* It would be more cost-efficient to undertake a national independent comparison of biosecurity cost-recovery arrangements within specific sectors (e.g. animal health, plant health) rather than each jurisdiction undertaking their own review. Cost differences are inevitable between both industries and jurisdictions, due to factors such as industry maturity, centralised versus regional service delivery and the need for regulatory intervention.
- *Draft recommendation 35:* A national investment strategy on the projected funds required to implement the improved national biosecurity system envisaged by the review report should be a pre-cursor to methodically reviewing all current jurisdictional biosecurity levies/rates/charges. The Review Panel’s suggestion that a small incoming international passenger charge could provide funding of components of the national biosecurity system deserves further investigation. Such passengers, whether international tourists or returning residents, are both risk creators (i.e. potential introducers of pests/diseases) and beneficiaries (i.e. trade, tourism, productivity and lifestyle benefits of Australia’s healthy biosecurity status). Similar consideration should be given to the applicability of such a national biosecurity levy applicability to international sea and air containers and parcel traffic.

Measuring system performance (Chapter 9)

- *Draft recommendations 36-39:* The South Australian Government supports moves to have cost-effective biosecurity performance measures, integrated biosecurity information management systems and biosecurity intelligence sharing across jurisdictions. Much work has already been done through NBC to agree on minimum national data standards and a concerted focus is now required on collaborative national implementation of these.

A future IGAB (Chapter 10)

- *Draft recommendation 40:* The three overarching reform areas (i.e. Governance and strategy; National priority pests and diseases; and Knowledge management and system performance) and their associated outcomes are generally supported. Commentary on the proposed NBC work program and outputs in Table 11 has been given above as they relate to specific draft recommendations.
 - It is agreed that the number of schedules in a revised IGAB could be simplified to four, as suggested in Table 12 of the draft review report.

Additional Emergency Management issues

National emergency response scenario training exercises need to continue to ensure preparedness of all stakeholders, including understanding of their respective roles, application of the Australasian Inter-Service Incident Management System (AIIMS) framework to biosecurity emergencies, testing legal instruments, and rapidly mobilising access to expertise and services.

The Property Identification Code (PIC) is a vital tool used in livestock disease outbreaks for rapid identification of properties at risk of being infested premises. Representatives of various plant industry peak bodies in South Australia have advocated for national implementation of a similar system for use in plant health emergencies.
