



Tasmanian Seafood Industry Council (TSIC)

Submission

Intergovernmental Agreement on Biosecurity (IGAB) Review

Draft Report

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TASMANIAN SEAFOOD INDUSTRY COUNCIL SUBMISSION ON THE INTERGOVERNMENTAL AGREEMENT ON BIOSECURITY REVIEW - DRAFT REPORT

1. Background

The Tasmanian Seafood Industry Council is the peak body for the wild catch, marine farm and seafood processing sectors of the Tasmanian seafood industry. The primary role of TSIC is to promote and represent the best interests of the industry as a whole.

The Tasmanian seafood industry is the most valuable seafood industry in Australia, producing over 55,500 tonnes of product valued at \$825 million¹. The industry operates around the entire Tasmanian coastline, utilising a range of gears and technologies to produce a diversity of wild caught and farmed seafood species. The key species harvested within Tasmania are farmed salmonids (47,184 t / \$620.5 million); wild caught rock lobster (1,040t / \$89 million); wild caught abalone (1,897 t / \$77.8 million); and farmed shellfish (4,207 t / \$26.6 million)². Tasmania is also the home to many vessels participating in Commonwealth managed fishery, which is regulated by the Australian Fisheries Management Authority (AMSA).

Tasmania's marine environment is a very difficult resource to manage with respect to biosecurity. There are a diverse range of users, including but not limited to seafood, tourism (including significant cruise ship visits), trade and recreation. Our marine environment is open access and community owned, which makes it near impossible to control the actions of all users. As such, there is a diverse range of vectors, such as ballast water, biofouling of vessels, translocation of animals and imported food products, which could transfer disease and pests into Tasmanian marine waters. If a disease or pest should establish in Tasmania, it is near impossible to fence off or isolate areas of the marine environment, meaning that disease or pest eradication within a marine environment is near impossible.

At present, Tasmania's marine environment, by virtue of its regional differentiation, is relatively disease and pest free. The entire Brand Seafood, Brand Tourism and Brand Tasmania uses this as a fundamental point of sale, gaining significant economic benefit and employment from this point of difference. Furthermore, many export approvals are reliant on this disease free status. There are many serious diseases and pests prevalent throughout Australia and the world, which if introduced to Tasmania would have significant detrimental impact on our primary production, both on land and in water. Any disease or pest incursion impacting major Tasmanian primary producers would have a significant and detrimental impact on Tasmania's economy and jobs.

¹ Australian Fisheries and Aquaculture Statistics 2015 (December 2016) pp 115

² Australian Fisheries and Aquaculture Statistics 2015 (December 2016) pp 115

TSIC's number one priority is to protect Tasmania's disease and pest free status. It is TSIC's view that biosecurity within the marine space must have a primary focus on preventing entry of disease and pests into our waters.

In general, TSIC view the Intergovernmental Agreement on Biosecurity (IGAB) as a proactive approach to managing biosecurity in Australia, including Tasmania. Furthermore, the cooperative approaches detailed within the IGAB review document are a good step forward for effective biosecurity management

As discussions over IGAB move forward, TISC main priority will be to ensure that the IGAB effectively protects Tasmania's current disease and pest free status by minimising the risk of any disease or pest incursion into our marine environment.

The TSIC submission

The Tasmanian Seafood Industry Council thanks the Department of Agriculture and Water Resources for the opportunity to comment on the review of the Intergovernmental Agreement on Biosecurity (IGAB). We would like to draw attention to TSIC's support of other submissions made as part of the review process: most notably the Tasmanian Salmonid Growers Association (TSGA), National Aquaculture Council (NAC) and Fisheries Research and Development Corporation (FRDC). Furthermore, TSIC supports any submission made by the Tasmanian Government.

The TSIC submission provides a brief outline of key Tasmanian seafood industry related considerations and priorities. Although this submission does not directly address feedback requests or recommendations, the considerations and priorities contained in this submission can be directly related to the IGAB review document.

TSIC biosecurity priorities

The Tasmanian seafood industry understands it has a shared responsibility to mitigate the establishment and spread of disease and aquatic pests in Tasmania. The Tasmanian seafood industry is subject to much regulatory and voluntary biosecurity protocols to minimise disease and marine pest risks. These regulatory and voluntary protocols are in general reviewed and tightened in the face of an increased biosecurity risk or threat, such as POMS.

Despite the rigidity of any regulatory or volunteer biosecurity controls, there are a diverse number of other marine resource users that can contribute to an aquatic disease or marine pest outbreak. Subsequently, outbreaks of known or new disease or pest is always possible within the marine environment, as industry and government cannot mitigate or control all risks.

As we progress forward with a new intergovernmental approach to biosecurity, it is important that TSIC articulate what it considers the most important biosecurity priorities.

1. Appropriate protection of pathways to entry.

This will require adequate recognition of regional differentiation within the biosecurity decision making process and maintenance of Tasmania's right to manage its own biosecurity risk. To adequately protect our first points of entry will require the expansion and

adaptiveness of first points of entry management and increased monitoring and surveillance.

2. Prioritising risk mitigation over economic, trade and/or political outcomes.

Tasmania's marine resources provide much to the Tasmanian. Any biosecurity decision making process must place a high level of importance on the consequences of any disease or pest incursion into Tasmania and the broader community, not just look at the risk.

3. Acknowledgement that a rapidly changing environment (climate change?) is increasing the biosecurity threat

Tasmania's East Coast is a global hotspot for a warming marine environment. There should be no doubt that this warming environment is influencing and changing the range of potential disease (i.e. Pacific Oyster Mortality Syndrome) and pests (i.e. urchins on the East Coast) and increasing the biosecurity threat.

4. There must be adequate resourcing for all biosecurity monitoring and response activities (IGAB).

Collaboration and understanding is key for IGAB success

The success of IGAB will rely on a strategic and collaborative approach. Industry end-users must be a partner in any collaborative approach. As such, TSIC supports the establishment of forum which includes industry, DAWR and state Governments as a foundation to the future implementation of IGAB.

It is vital that all IGAB partners have full 'buy-on' to IGAB. To do this, all stakeholders must fully understand their roles and responsibilities. IGAB is a top level, government focused document. Industry struggles to understand the detail contained within such documents. TSIC suggest the development of an industry level communication plan to ensure that the detail contained within the IGAB is understood by industry. This point builds on the need for a collaborative approach to IGAB, which must include industry participation.

Biosecurity is more than just market access

TSIC understands the importance of interstate and international trade for Tasmania's economy. We further understand that trade requires a two way agreement. Today's world has an ever increasing reliance on interstate and international transfer of goods. This scenario increases the biosecurity risk, which in turn opens up potential dispute between states / countries. Given this increasing potential for disease and pest transfer, biosecurity is about a lot more than market access.

TSIC does not support the IGAB as a tool for Commonwealth intervention on state or international based biosecurity issues and concerns. Noting Tasmania's relative disease and pest free status and regional differentiation, it is TSICs firm view that Tasmania reserve the right to manage its own biosecurity risk.

It is this premise that has resulted in the Tasmanian Government not being signatories to the current IGAB. The one clause of significant concern is Section 7, subsection 7.19 – *Interstate Trade*, which gives the Commonwealth final decision making powers over any

domestic trade restriction dispute. TSIC supports the Tasmanian Governments view that this is an infringement of Tasmanian sovereign rights to manage its own biosecurity risks. TSIC requests that this section of IGAB be redeveloped to accept that a state retains the right to make and defend its own biosecurity related decisions around interstate trade.

In making this recommendation, TSIC acknowledge that the biosecurity decision making process must be transparent, collaborative and must have a scientific foundation. With respect to regional differentiation and the importance of primary industries to the Tasmanian economy, biosecurity decision making processes must not just place a weighting on the risk of an incursion, but must also place adequate weighting on any consequences of an incursion. This process must consider issue and relevance above and beyond market access.

Responding to a disease or pest incursion

Previous experience with Pacific Oyster Mortality Syndrome (POMS) shows the need for very rapid response time to disease and marine pests. Any delay will result in further spread and impact on industry. Although TSIC agrees with the IGAB premise to ensure any response is appropriate, any delays could be very costly, especially in the marine environment. A rapid response will allow disease/pest control, prevent spread, maximise continued trade of product and better protect regional economies and jobs.

A further seafood industry concern around any disease or pest incursion is the 'who pays' debate. Under current policy, there is a 'beneficiary pays' / impacted industry pays approached to management. It is TSICs view that greater emphasis should be placed on a risk creator pays model.

It is TSICs view that prevention is the best cure. Identifying existing and new disease/pest entry pathways and adequate resources for surveillance of these pathways; combined with adequate deterrents for biosecurity breaches, are required.

Such an outcome will require increased investment in IGAB.

Research and innovation

Australia's national biosecurity system must have significant investment into research and innovation, especially with respect to identifying and managing pathways of entry. To achieve this, TSIC supports the establishment of a new stand-alone entity for cross-sectorial biosecurity R&I.

In summary

Biosecurity is paramount to protecting Tasmania's marine industries and marine resources. Biosecurity can only be everyone's responsibility if all stakeholders are around the table. Everyone must know their roles and responsibilities, and ultimately, all stakeholders must have the confidence that IGAB is an effective model to protect their industry. To achieve this, collaboration and inclusion will be vital.

Yours Sincerely

A handwritten signature in blue ink, appearing to read 'J. Harrington', written in a cursive style.

Julian Harrington
Chief Executive TSIC.